

GODLEWSKI V. ALVEAR, NO. 3:24-CV-00344 (JKM)  
DEFS.' MOT. TO DISMS.

# EXHIBIT “I”

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IN THE COURT OF COMMON PLEAS  
OF LACKAWANNA COUNTY, PENNSYLVANIA

\* \* \*

PHILIP GODLEWSKI, : CIVIL DIVISION  
Plaintiff :  
vs : JURY TRIAL DEMANDED  
CHRIS KELLY, et al., :  
Defendants : NO. 2021-CV-2195

\* \* \*

Oral deposition of DOROTHEA "DORI"  
GALLAGHER, taken at the Lackawanna County Bar  
Association, 233 Penn Avenue, Scranton, Pennsylvania  
18503, on Thursday, July 20, 2023, beginning at 10:06  
a.m. before Pamela Pratt, Court Reporter and Notary  
Public in and for the Commonwealth of Pennsylvania.

\* \* \*

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EXHIBIT



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		Page 2		Page 4
1	APPEARANCES:		1	* * *
2	TIMOTHY BOWERS, ESQUIRE		2	(It is hereby stipulated and agreed by
3	KOLMAN LAW, PC		3	and among counsel for the respective parties that
4	414 Hulmeville Avenue		4	sealing, certification, and filing are waived and that
5	Penndel, Pennsylvania 19047		5	all objections, except as to the form of the question,
6	(844)537-2529		6	are reserved until the time of trial.)
7	TKolman@Kolmanlaw.com		7	(Exhibit I binder was premarked for identification.)
8	-- Representing the Plaintiff		8	* * *
9	J. TIMOTHY HINTON, ESQUIRE		9	DOROTHEA "DORI" GALLAGHER,
10	HAGGERTY HINTON & COSGROVE, LLP		10	having been first duly sworn, was
11	1401 Monroe Avenue, Suite 2		11	examined and testified as follows:
12	Dunmore, Pennsylvania 18509		12	* * *
13	(570)344-9845		13	EXAMINATION
14	timhinton@haggertylaw.net		14	BY MR. HINTON:
15	-- Representing the Defendants		15	Q. Please state your full name.
16			16	A. Dorothea Gallagher Godlewski.
17	JOHN R. WILLIAMS, ESQUIRE		17	Q. Okay. Legal name right now is Dorothea --
18	WILLIAMS LAW		18	A. Dorothea Gallagher.
19	700 Vine Street		19	Q. Gallagher.
20	Scranton, Pennsylvania 18510		20	A. Yes.
21	(570)309-6857		21	Q. Is it okay if I call you Dori?
22	jrwesq@johnwilliamslaw.com		22	A. Yes.
23	-- Representing the witness		23	Q. Dori, my name's Tim Hinton. I represent The
24	Dorothea Gallagher		24	Scranton Times, Chris Kelly and Larry Holeva. They're
25			25	the defendants in a lawsuit brought by your ex-husband,
		Page 3		Page 5
1	I N D E X		1	Phil Godlewski.
2	* * *		2	A. Okay.
3			3	Q. I'm going to take your deposition today.
4			4	Have you ever had your deposition taken before?
5	WITNESS: Dorothea "Dori" Gallagher		5	A. No.
6			6	Q. Okay. You testified in the custody case with
7	QUESTIONED BY: PAGE		7	Phil, though, right?
8			8	A. Yes.
9	Mr. Hinton 4, 102		9	Q. This is similar.
10	Mr. Bowers 98		10	A. Oh, okay.
11			11	Q. Similar to a deposition. That was in court.
12			12	So it's a question-and-answer session under oath.
13			13	You've got to tell the truth. You've been sworn in just
14			14	as if you're in a courtroom, okay?
15			15	A. Okay.
16			16	Q. There's a couple of ground rules for
17	E X H I B I T S		17	depositions. You have to verbalize all of your
18			18	responses rather than shaking your head or nodding your
19	* * *		19	head, okay?
20			20	A. Okay.
21			21	Q. You have to let me finish my question before
22	MARKED		22	you begin talking so that the court reporter can get
23	NUMBER DESCRIPTION	FOR ID	23	down everything, okay?
24			24	A. Okay.
25	1 Exhibit binder	4	25	Q. If you answer my question, can we assume that

2 (Pages 2 - 5)

<p style="text-align: right;">Page 6</p> <p>1 you heard and understood my question?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. If you are confused by any of my</p> <p>4 questions, you don't understand it, would you please let</p> <p>5 me know that so I can rephrase?</p> <p>6 A. Okay.</p> <p>7 Q. All right. Great. So Dori, what is your</p> <p>8 address right now? Where do you live?</p> <p>9 A. [REDACTED]</p> <p>10 Q. Okay. Is that the house that you and Phil</p> <p>11 owned together at one point in time?</p> <p>12 A. Yes.</p> <p>13 Q. Are you the sole owner of that house now?</p> <p>14 A. Yes.</p> <p>15 Q. And what's your date of birth?</p> <p>16 A. [REDACTED].</p> <p>17 Q. And Phil's date of birth is [REDACTED], 1983?</p> <p>18 A. Yes.</p> <p>19 Q. So Phil would be three-years-and-four-months</p> <p>20 older than you?</p> <p>21 A. Yes.</p> <p>22 MR. HINTON: Now, one of the things we</p> <p>23 didn't talk about -- Tim, we're going to do the usual</p> <p>24 stipulations for the deposition?</p> <p>25 MR. BOWERS: Yeah. And we might want to</p>	<p style="text-align: right;">Page 8</p> <p>1 egregious occur that Mr. Hinton does, okay?</p> <p>2 MR. HINTON: Very good. Thank you.</p> <p>3 BY MR. HINTON:</p> <p>4 Q. Dori, have you had any conversations with</p> <p>5 Phil's attorneys in preparation for today's deposition?</p> <p>6 A. No.</p> <p>7 Q. Did Phil send you any text messages or</p> <p>8 e-mails about today's deposition?</p> <p>9 A. Not really, no. Just, kind of, that it was</p> <p>10 today and the time and -- I mean, we didn't really</p> <p>11 discuss what would happen or anything like that.</p> <p>12 Q. Did he talk to you about some of the</p> <p>13 questions I may ask you about Brienna or --</p> <p>14 A. No, not really. I think he said something</p> <p>15 about the Facebook conversations that I had had with</p> <p>16 Brie will most likely come up. But that was, pretty</p> <p>17 much, it.</p> <p>18 Q. Okay. When was the Facebook conversation</p> <p>19 with Brie?</p> <p>20 A. That was -- oh, boy. That was years ago. I</p> <p>21 don't know exactly when. But I had -- I can't</p> <p>22 remember -- I can't even remember if I had messaged her</p> <p>23 first or she messaged me. But it was basically a</p> <p>24 conversation about, you know, what was going on between</p> <p>25 them. And she had just said that he was like a big</p>
<p style="text-align: right;">Page 7</p> <p>1 just have a little discussion quick about the procedure</p> <p>2 for --</p> <p>3 MR. HINTON: Spousal privilege.</p> <p>4 MR. BOWERS: -- spousal immunity -- or</p> <p>5 spousal privilege issues.</p> <p>6 MR. HINTON: The ground rules we agreed</p> <p>7 to in connection with the Court Order and your e-mail</p> <p>8 about the five-step procedure are fine by me. We both</p> <p>9 have that e-mail. I would only state that if you are</p> <p>10 asserting spousal privilege to any of my questions, that</p> <p>11 you put that on the record now. Those won't be</p> <p>12 preserved, okay?</p> <p>13 MR. BOWERS: Right. To the extent that</p> <p>14 we're going to assert it, we'll assert it today as the</p> <p>15 question is asked.</p> <p>16 MR. HINTON: Very good.</p> <p>17 MR. WILLIAMS: I don't mean to</p> <p>18 interrupt. You're going assert that privilege?</p> <p>19 MR. BOWERS: We are going to assert that</p> <p>20 privilege on a question-by-question basis.</p> <p>21 MR. WILLIAMS: Okay.</p> <p>22 MR. BOWERS: As some may be covered,</p> <p>23 some may not.</p> <p>24 MR. WILLIAMS: So I'm not going -- I</p> <p>25 won't make any objections unless I see something</p>	<p style="text-align: right;">Page 9</p> <p>1 brother to her. He was helping her through a hard time</p> <p>2 and nothing ever happened and I had nothing to worry</p> <p>3 about and that was it.</p> <p>4 Q. Do you still have that Facebook conversation?</p> <p>5 A. I do not. I don't even have that account</p> <p>6 anymore.</p> <p>7 Q. Have you looked for it, see if you have a</p> <p>8 copy of it somewhere?</p> <p>9 A. No.</p> <p>10 Q. All right. So when did you and Phil talk</p> <p>11 about Brie and this conversation leading up to today's</p> <p>12 deposition?</p> <p>13 A. That was a while ago. I think it was</p> <p>14 before -- before I even, kind of, knew when this was</p> <p>15 going to happen.</p> <p>16 Q. "This" meaning this deposition?</p> <p>17 A. Yeah. Like, I was going to come. I'm, like,</p> <p>18 well -- because when he had started the lawsuit, I knew</p> <p>19 that he had mentioned my name in the lawsuit. So I</p> <p>20 said, like, I want nothing to do with this. Why did you</p> <p>21 include me? Whatever. And he said, the only thing</p> <p>22 that's going to happen is what we're doing today. And I</p> <p>23 said, well, what's going to happen there? And they said</p> <p>24 that -- he had said that, like, things that I know, like</p> <p>25 the Facebook thing may be asked. But that was -- that</p>

3 (Pages 6 - 9)

Page 10	Page 12
1    was it.	1    A.    Yes.
2    Q.    All right. So you live at Huckleberry,	2    Q.    Did he buy that car for you that you're
3    right?	3    driving out there?
4    A.    Yes.	4    A.    No.
5    Q.    And you live there with your two sons?	5    Q.    Okay. The Volkswagen I saw you pull up in.
6    A.    Yes.	6    A.    Yeah. No.
7    Q.    And is there a mortgage on the house there?	7    Q.    Was there any cash settlement as part of the
8    A.    No.	8    divorce?
9    Q.    Did Phil pay that mortgage off as part of the	9    A.    No.
10   Q.    divorce?	10   Q.    He didn't give you a check?
11   A.    Yes.	11   A.    Huh-uh.
12   Q.    How much was the payment?	12   Q.    No payments?
13   A.    I don't know.	13   A.    Nope. Just the child support. That's it.
14   Q.    Give me a rough idea.	14   Q.    Is that still a thousand dollars a month?
15   A.    I honestly have no idea. I really don't	15   A.    No.
16   know.	16   Q.    How much is it now?
17   Q.    Over a hundred thousand dollars?	17   A.    12,500.
18   A.    Over, yeah. Yeah.	18   Q.    Per month?
19   Q.    Over \$200,000?	19   A.    Yes.
20   A.    Probably -- we were under contract to buy it	20   Q.    And when did he start paying 12,500 per
21   for two-something. So yeah, it was over 200. Yeah.	21   month?
22   Q.    That you owed on the house and Phil paid off?	22   A.    A little over a year ago, probably. Yeah.
23   A.    He paid it off before it was transferred to	23   Sorry.
24   me.	24   MR. WILLIAMS: Those are public records,
25   Q.    When did he pay it off?	25   I think.
Page 11	Page 13
1    A.    I believe when he bought it. So we were in a	1    THE WITNESS: Yeah.
2    rent-to-own agreement when I had lived with him. And	2    BY MR. HINTON:
3    before I moved out, we were still under that agreement.	3    Q.    So you work at Great -- what's it called,
4    So he bought the house after I had left. And he, I	4    Great Iron -- what's the name of your --
5    believe, had a mortgage on it and he only had to pay off	5    A.    Iron Valley.
6    a hundred thousand dollars after that. So he didn't	6    Q.    Iron Valley.
7    really pay anything when he gave it to me. He, kind of,	7    A.    Yes.
8    just gave me the house as a part of the divorce.	8    Q.    With Jolen Brennan?
9    Q.    Okay. He deeded the house to you loan-free?	9    A.    Yes.
10   A.    Yes.	10   Q.    And you're a licensed Realtor?
11   Q.    Okay. So you moved out of that house when	11   A.    Yes.
12   you filed for divorce?	12   Q.    How long have you been a licensed Realtor?
13   A.    Before I filed. But yes.	13   A.    Probably about five years now.
14   Q.    Okay. February of 2021, you moved out?	14   MR. HINTON: Tim, here's some exhibits
15   A.    Yes.	15   I'm going to use during the deposition.
16   Q.    And you took the kids with you?	16   BY MR. HINTON:
17   A.    Yes.	17   Q.    So I want you to turn to a page in that
18   Q.    Did you go to Melissa's?	18   booklet I just gave you.
19   A.    Yes.	19   A.    Okay.
20   Q.    How long did you live with Melissa?	20   Q.    There's Bates stamps on the bottom right-hand
21   A.    I believe I was there until April -- around	21   portion of them.
22   April, I moved into my own place. But I was there for	22   A.    Okay.
23   about three months.	23   Q.    And we're going to go to Page 2155. Do you
24   Q.    As part of the divorce, Phil transferred a	24   see ST2155?
25   house that was in just his name to just your name?	25   A.    Oh, yes.

4 (Pages 10 - 13)

			Page 14	Page 16
1	Q.	Do you see a sheet there with your name on it?	1	A. Yes.
2	A.	Yes.	2	Q. You started dating in 2005?
3	Q.	And it indicates that you were to receive commissions for the sale of copper, bronze, commission payouts. Do you see that, from 7K Metals?	3	A. That summer, yeah.
4	A.	Yes.	4	Q. And what was Phil doing at that time?
5	Q.	And did you receive \$4,500 that's shown on ST2155?	5	A. He had worked at his family's gas station.
6	A.	I did not.	6	Q. Osmolia's?
7	Q.	Do you know who did receive that money, if anybody?	7	A. Osmolia's, yep.
8	A.	No.	8	Q. The Shell station?
9	Q.	Did you ever get a 1099 form from 7K Metals?	9	A. Yeah.
10	A.	I did not.	10	Q. And they had a Subway shop there too?
11	Q.	Have you ever gotten any money from 7K Metals?	11	A. Yes. Yeah.
12	A.	No.	12	Q. So in 2005 when you met him, he was working at Osmolia's and in the Subway store?
13	Q.	Have you had conversations with Phil about using your name in his multi-level marketing business with 7K Metals?	13	A. I don't believe he worked in the Subway store. Just Osmolia's, like, service station.
14	A.	MR. BOWERS: Objection. You need to establish a time to determine spousal privilege.	14	Q. Was he also going to school?
15	BY MR. HINTON:		15	A. Yes.
16	Q.	Well, first of all, have you ever had any conversations, yes or no, and then we'll go into that.	16	Q. Was he at the University of Scranton then?
17	A.	Yes.	17	A. Yes.
18	Q.	Okay. Was it while you were married to Phil?	18	Q. And then he later went to Johnson?
19	A.	Yes.	19	A. Johnson? Yeah. Yeah, he did. It was a long time ago.
20	Q.	MR. HINTON: Okay. And if I ask her what those conversations are, you're asserting spousal privilege?	20	Q. And before you had met Phil, had you heard about Phil before you met him?
21	A.	MR. BOWERS: We are.	21	A. No, not really.
22	Q.	MR. HINTON: Okay.		
23	BY MR. HINTON:			
24	Q.	Have you had any conversations with Phil after the divorce about him signing you up with 7K Metals?		
25	A.	No.		
	Q.	Okay. And your testimony is, you've never received any money from 7K Metals?		
	A.	Correct.		
	Q.	Where did you and Phil first meet?		
	A.	I worked at a tanning salon on Moosic Road in Old Forge.		
	Q.	Was that in about 2005?		
	A.	Yes, summer of 2005.		
	Q.	And was he a customer there?		
	A.	Yes.		
	Q.	And did you start dating after you met?		
			Page 15	Page 17
1	Q.	Okay. And how soon after you met did you begin dating him?	1	Q. Okay. And how soon after you met did you begin dating him?
2	A.	Yeah.	2	A. I don't know. A couple weeks, probably.
3	Q.	And were you together with him from that point until you married him?	3	Q. And were you together with him from that point until you married him?
4	A.	Yeah.	4	A. Yeah.
5	Q.	In 2012?	5	Q. September?
6	A.	Yeah.	6	A. Yep.
7	Q.	Okay. And he was over 21?	7	Q. All right. So in 2005, how old were you at that time?
8	A.	He was.	8	A. I had just graduated, so 18.
9	Q.	When you first started dating him, what did he tell you about his past?	9	Q. Okay. And he was over 21?
10	A.	That he played baseball and just, like, normal stuff; baseball, his family store, we talked about that. Just basic -- basic stuff.	10	A. He was.
11	Q.	Did he tell you he went out to Duquesne University?	11	Q. When you first started dating him, what did he tell you about his past?
12	A.	Yes.	12	A. That he played baseball and just, like, normal stuff; baseball, his family store, we talked about that. Just basic -- basic stuff.
13	Q.	To play baseball?	13	Q. Did he tell you he went out to Duquesne University?
14	A.	Yes.	14	A. Yes.

5 (Pages 14 - 17)

	Page 18	Page 20
1	Q. He stayed out there for a year?	1 marriage or during the time you've known Phil that he
2	A. Yes.	2 worked in the intelligence community?
3	Q. And did he tell you he never actually played	3 A. No.
4	baseball on the team?	4 Q. Do you know whether Phil ever graduated from
5	A. He did not.	5 college?
6	Q. Was it your understanding that he actually	6 A. No. I don't think he did as far as I know,
7	played a game of baseball for Duquesne University?	7 no.
8	A. Yeah.	8 Q. Okay. So it's your testimony, based on
9	Q. He never told you that he never got past the	9 everything you know about Phil and all of the years
10	spring workouts for baseball?	10 you've been with him, he never graduated from college?
11	A. No.	11 A. No.
12	Q. What else did he tell you about his past?	12 Q. That's a correct statement I'm making, right?
13	A. That he -- as far as, like, at that time?	13 A. Yes. Yeah.
14	Q. Yeah.	14 Q. Has Phil ever told you that he met Donald
15	A. He blew his arm out at home and that was why	15 Trump?
16	he couldn't go back to school -- well, not why he	16 A. No.
17	couldn't go back to school but why he did not go back to	17 Q. When did you and Phil start living together?
18	school for baseball. He also had said that he didn't go	18 A. We -- oh, boy. It was right around when he
19	back because of his ex-girlfriend.	19 started real estate. His dad had bought a house for us
20	Q. What was her name?	20 in Scranton and then I had bought it off of him. I
21	A. Jessica Turi.	21 don't -- I would say 2006, 2007. I'm not exactly sure.
22	Q. Spell the last name.	22 Q. Let's look at ST473, please.
23	A. T-U-R-I. I believe she's married now.	23 A. 473?
24	Q. Who is she married to?	24 Q. Yeah. This was in a newspaper, a property
25	A. I'm not sure.	25 transaction from John and Nancy Godlewski to Dorothea
	Page 19	Page 21
1	Q. How old is Jessica?	1 Gallagher and Phil Godlewski, property at 430 Cayuga
2	A. She's older than me.	2 Street in Scranton for 57,500.
3	Q. Closer to Phil's age?	3 A. Yes.
4	A. Yeah.	4 Q. And was that was a deed transfer from Phil's
5	Q. Did Phil tell you that he did some bartending	5 dad -- John and Nancy to you and Phil?
6	out in Pittsburgh?	6 A. So we purchased the property from them, yes.
7	A. Yes.	7 Q. In 2009?
8	Q. And did he tell you where he bartended in	8 A. Yes.
9	Pittsburgh?	9 Q. Did you live in that house before you
10	A. He probably did, but I don't remember.	10 purchased it?
11	Q. Okay. Did he go to bartending school in	11 A. Yes.
12	Pittsburgh?	12 Q. For how long?
13	A. I'm not sure.	13 A. I would say a year or two, maybe. I'm not a
14	Q. Okay. Did he ever tell you when you started	14 hundred percent sure. But when they had bought the
15	dating him that he worked for the CIA?	15 property, we moved in -- when John and Nancy had bought
16	A. No.	16 the property.
17	Q. Did he ever tell you he worked for the NSA?	17 Q. Okay. How long did you and Phil live at
18	A. No.	18 Cayuga Street?
19	Q. Did he ever tell you that he worked for the	19 A. We were there for -- oh, boy. This was
20	FBI?	20 2000 -- when was this?
21	A. No.	21 Q. 2009 is the deed transfer.
22	Q. Did he ever tell you that he worked for the	22 A. 2009. I think we bought our house in Avoca
23	intelligence community?	23 in -- I don't know, 2013, maybe, somewhere around there.
24	A. No.	24 So we lived in Cayuga and then we moved to Grove Street
25	Q. Have you ever seen any evidence during your	25 in Avoca.

6 (Pages 18 - 21)

<p style="text-align: right;">Page 22</p> <p>1 Q. Okay. Did you buy that house in Avoca?</p> <p>2 A. Phil had purchased it, yes, but together we 3 bought it.</p> <p>4 Q. Okay. Which house did you sell to Luann 5 Holmes?</p> <p>6 A. This one, Cayuga Street. That's my mom.</p> <p>7 Q. That's your mom?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. So from the time you started living 10 together at Cayuga Street a year or so before the deed 11 transfer, you lived with Phil except for some 12 separations up until February of 2021?</p> <p>13 A. I don't think we -- I mean, we had very 14 minimum separations. If -- I mean, it would be, like, 15 maybe a day or something. We never really --</p> <p>16 Q. You'd go to Melissa's?</p> <p>17 A. Usually, he would leave.</p> <p>18 Q. Where would he go to?</p> <p>19 A. Hotel. I don't -- I don't really know.</p> <p>20 Q. Did that happen during the Miranda Polidori 21 situation?</p> <p>22 A. Yes.</p> <p>23 Q. How long did he leave the home because of his 24 affair with Miranda?</p> <p>25 A. About two weeks.</p>	<p style="text-align: right;">Page 24</p> <p>1 Summit. I can't think of her name right now.</p> <p>2 Q. Was it Vennie?</p> <p>3 A. No.</p> <p>4 Q. Vennie, V-E-N-N-I-E, Katherine?</p> <p>5 A. Katherine. Yes, Katherine. Yes. That's her 6 first name. I can't remember her last name, though.</p> <p>7 But yes.</p> <p>8 Q. And what years were the marriage counseling 9 visits, 2017 or '18?</p> <p>10 A. Yeah. Because [REDACTED] was a baby, yeah.</p> <p>11 Q. So let's turn to ST474. So this is the 12 announcement in the newspaper about your engagement to 13 Phil; is it not?</p> <p>14 A. Yes.</p> <p>15 Q. And you got engaged to Phil in November of 16 2007?</p> <p>17 A. Yeah, sounds like.</p> <p>18 Q. When you and Phil were still engaged, did you 19 often talk about some day moving to California, San 20 Diego in particular? Do you remember that?</p> <p>21 A. I don't remember that.</p> <p>22 Q. I'm going to have you turn to ST2844. So, 23 Dori, these are text messages that have been produced in 24 the case from the criminal case between Phil and 25 Brienna -- I'm go to call her Brie for short.</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. Okay. And did you tell him you were going to 2 file for divorce at that point in time?</p> <p>3 A. No.</p> <p>4 Q. You never threatened to file for divorce 5 before?</p> <p>6 A. I did not. I told him that we could figure 7 it out. We had two small kids at the time. That was 8 before I knew it was actually true.</p> <p>9 Q. This affair with Miranda?</p> <p>10 A. Yeah. I kept questioning it and I told him 11 if it's true, just tell me it's true and we'll figure it 12 out. But then when I found out that it was actually 13 true, that was when I had asked him to leave.</p> <p>14 Q. And he left for about two weeks?</p> <p>15 A. Yeah.</p> <p>16 Q. And how did you resolve the situation after 17 that?</p> <p>18 A. We were -- we had a family trip planned to a 19 beach and I asked him to still come. We had two small 20 kids. And I don't know. We just, kind of, like, talked 21 everything out and decided to, you know, get into 22 marriage counseling and try to fix, you know, what was 23 going on.</p> <p>24 Q. Who did you go to for marriage counseling?</p> <p>25 A. What the heck was her name? She's in Clarks</p>	<p style="text-align: right;">Page 25</p> <p>1 A. Okay.</p> <p>2 Q. And in these text messages on March 10th 3 of -- I'm sorry, March 6th of 2010, there's a 4 conversation between Brie and Phil about some post that 5 was made about you and Phil moving to San Diego. So I'm 6 asking, does that refresh your recollection that you and 7 Phil would post Facebook posts or something about moving 8 to San Diego some day, somewhere warm?</p> <p>9 A. I don't remember that.</p> <p>10 Q. Is it possible?</p> <p>11 A. That he made a Facebook post about us moving?</p> <p>12 Q. You made a Facebook post, I believe.</p> <p>13 A. No, I don't think -- I don't -- I don't 14 remember that at all, no.</p> <p>15 Q. You don't remember any social media posts 16 about --</p> <p>17 A. Us moving to there?</p> <p>18 Q. Yeah.</p> <p>19 A. No.</p> <p>20 Q. Did you ever go to California?</p> <p>21 A. No.</p> <p>22 Q. Did you ever go to Florida?</p> <p>23 A. Yes.</p> <p>24 Q. Did you go to Florida with Phil?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 26</p> <p>1 Q. Did you and Phil have some dream about moving 2 to Florida some day?</p> <p>3 A. I mean, maybe. I don't know. I mean, I 4 don't think so. I don't really think that -- no.</p> <p>5 Q. Do you know Phil's mother's birth date, 6 Marie?</p> <p>7 A. I know it's January.</p> <p>8 Q. January 8th?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. You remember that?</p> <p>11 A. Yeah.</p> <p>12 Q. And that's Marie, right.</p> <p>13 A. Marie, correct.</p> <p>14 Q. And do you see Phil's text message 15 about two-thirds of the way down incoming? "It appears 16 that you're talking about a January 8th post that I 17 referred to moving to San Diego. But yeah, I guess 18 that's close to a week ago, whatever. Text me when 19 you're over it." He's talking to Brie. And then two 20 below that he says, "It was [REDACTED]. I just looked 21 and that was two days before we started talking. I know 22 because January 8th is my mom's birthday and we started 23 after that." Do you see that?</p> <p>24 A. Uh-huh.</p> <p>25 Q. Does that text message sound like Phil, given</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. Is that when you moved out of the -- 2 A. Cayuga into -- no. So we had moved into 3 Grove Street. My mom moved into Cayuga, but it took 4 her, I think, a year or so to be able to purchase the 5 property from us.</p> <p>6 Q. Okay. All right. I want you to turn to the 7 back of the note -- or back of the exhibits. There's a 8 hearing transcript from a hearing in front of Judge 9 Minora on February 6th, 2023 where Phil testified. And 10 I want to direct your attention to Page 83.</p> <p>11 A. Okay.</p> <p>12 Q. So I want you to follow along in the 13 testimony. I'm questioning Phil on Page 83 on Line 19 14 down at the bottom.</p> <p>15 A. Okay.</p> <p>16 Q. I said, "Okay. Well, let's get that on paper 17 here. When was your recent sexual relationship with 18 her?" And I'm asking about Brie. And if we go to the 19 next page, go down to Line 6, I asked when did he begin 20 a sexual relationship with Brie?</p> <p>21 A. I lost it. Oh, okay.</p> <p>22 Q. Go to Line 9, Phil's answer in this hearing 23 on February 6th was, "I would say 2013, 2014, '15, 24 somewhere in that." And then we go on. I asked on Line 25 11, "All right. So you're still on probation at the</p>
<p style="text-align: right;">Page 27</p> <p>1 the years of texting you've had with him?</p> <p>2 A. Yeah.</p> <p>3 Q. Okay. So your son [REDACTED] he was born 2015?</p> <p>4 A. Yes.</p> <p>5 Q. And [REDACTED] was born in 2017?</p> <p>6 A. Yes.</p> <p>7 Q. And what's the custody arrangement now 8 between you and Phil?</p> <p>9 A. 60/40.</p> <p>10 Q. You have 60 percent?</p> <p>11 A. Yes.</p> <p>12 Q. And do you allow the boys to travel with him 13 to Arizona and Nevada?</p> <p>14 A. Unfortunately, yes.</p> <p>15 Q. Okay. And when you filed for divorce, you 16 wanted Phil to only have supervised custody at that 17 time; is that correct?</p> <p>18 A. Yes.</p> <p>19 Q. You had concerns about Phil?</p> <p>20 A. Yes.</p> <p>21 Q. So just to nail down the dates here, if you 22 turn to ST3871, that's the deed from Dorothea and Phil 23 Godlewski to Luann Holmes, your mother, in 2016. Do you 24 see that?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 29</p> <p>1 time -- at that time from corrupting her at that time 2 and you're having sex with her at that time?" And his 3 answer was, "No." Question: "You were on probation for 4 two years; weren't you?" Answer: "I know. You're 5 putting me on the spot and I can't remember when our 6 relationship was." Question: "So let's get this 7 straight. So you admitted in court..." Answer: "I'm 8 sorry. I could correct the record, if I may. It was 9 almost certainly from 2015 to 2016 and I remember that 10 because of the time that I started my real estate 11 company was the same year." Question: "Okay. So you 12 started the agency with George Plisko, correct, 2015?" 13 Answer: "Correct." "And at that time, you began a 14 sexual relationship with Brie?" Answer: "Yes." 15 Down at the bottom of the page on Line 16 22 I asked the question, "And you served probation for 17 two years and then you began a sexual relationship with 18 the person you corrupted earlier?" Answer: "Yes." 19 Next page. Question: "Do you see 20 anything wrong with that?" Answer: "No." So were you 21 aware of their sexual relationship in 2015? 22 A. No. 23 Q. Were you aware of a sexual relationship in 24 2013 or '14? 25 A. No.</p>

<p style="text-align: right;">Page 30</p> <p>1 Q. Did Phil ever admit to you at any point that 2 he had a sexual relationship -- 3 MR. BOWERS: Objection. Spousal 4 privilege depending on time frame. 5 BY MR. HINTON: 6 Q. Did Phil ever admit to you that he had a 7 sexual relationship with Brie before you became married 8 to Phil on September 21st of 2012? 9 A. No. 10 Q. After your divorce from Phil in May of 2023, 11 did Phil ever admit that he had a sexual relationship 12 with Brie? 13 A. No. 14 Q. He just always denied it; didn't he? 15 A. Yes. 16 Q. Deny, deny, deny, right? 17 A. Yes. 18 Q. Dori, didn't you have about a two-hour phone 19 conversation with Brie a couple years back on the phone? 20 A. I did, yes. 21 Q. And didn't you apologize to Brie for not 22 believing her? 23 A. I did. 24 Q. And she had told you -- she came to your 25 workplace when she was a minor with one of her friends</p>	<p style="text-align: right;">Page 32</p> <p>1 Q. And besides that relationship during the 2 marriage and the relationship with Miranda Polidori, 3 were there other females he had extramarital affairs 4 with? 5 A. As far as I know, no. I did find nude 6 pictures on his phone -- or in his e-mail. But no. As 7 far as I know, no. 8 Q. Did he send those nude photos on his phone to 9 Melissa, who's Jason Thomas's girlfriend? 10 A. I never -- I never saw it directly to 11 Melissa. I just know that they were out there. I never 12 saw, like, who they were sent to or anything like that. 13 Q. What year was that that he was sending nude 14 photos around to other girls? 15 A. 2000 -- well, I don't know. That was 16 probably -- I don't know. I don't know exactly when 17 that was. 18 Q. What kind of reputation did Phil have? 19 A. Honestly, he had a -- he had a good 20 reputation. I mean, he came up from, you know, people 21 trying to bash him when he first opened the company to, 22 you know, this great company and a great reputation. 23 And I don't know what happened. I don't know. 24 Q. Okay. How about the Mariotti lumber case? 25 He went to jail for 30 days. How was his reputation</p>
<p style="text-align: right;">Page 31</p> <p>1 and told you at that time that she was involved in a 2 romantic relationship with Phil; didn't she? 3 A. Yeah, she did. 4 Q. She wanted to play a voicemail message on her 5 phone to you; didn't she? 6 A. At that time, no. 7 Q. At a later time? 8 A. At a later time, she did, yes. 9 Q. This was before Phil was charged, right? 10 A. Correct. 11 Q. He was charged in July of 2010 -- 12 A. Actually, no. When she came to me at my 13 workplace, it was after he was charged. 14 Q. Be he hadn't pled guilty yet? 15 A. No. 16 Q. And she came to you and said what? 17 A. That Phil was going to be calling her. And 18 we stood there -- I stood there outside of work for, I 19 don't know, half-an-hour. She's, like, he's calling me 20 at this time, he's calling me, he's calling me. And he 21 never called her. And I called her a liar and I left. 22 Q. Besides the obvious affair with Brie during 23 your marriage right after -- around the time [REDACTED] was 24 born, right, if it's 2015? 25 A. Apparently, yeah.</p>	<p style="text-align: right;">Page 33</p> <p>1 then? 2 A. Not good. 3 Q. Okay. And how about all the publicity from 4 the sexual charges involving Brie, how was his 5 reputation then? 6 A. Back then or now? 7 Q. Back then. 8 A. Honestly, I, at that time, kind of, tuned 9 myself out from all of it. So I want to say that it 10 wasn't good, but I didn't get involved. Like, I just -- 11 I believed him and I didn't get involved in what other 12 people thought at the time. 13 Q. Did you ever talk to Jason Thomas about the 14 photo that Phil sent to his girlfriend? 15 A. I believe I did, yeah. 16 Q. What did he tell you? 17 A. He just told me that he had taken Phil for a 18 ride and, pretty much, threatened him, you know, so... 19 Q. He told you why he threatened him, though? 20 A. He said that -- I don't know if he said that 21 there was a picture. I can't say that he said there was 22 a picture. But he said that something inappropriate had 23 happened. 24 Q. Didn't he tell you that Phil sent a picture 25 of his penis to his girlfriend?</p>

<p style="text-align: right;">Page 34</p> <p>1 A. I don't remember what exactly he said.      2 Honestly, I don't.      3 Q. Why did Phil and his mom become estranged?      4 A. I want to say it was because of what he put      5 me through. But I don't really know exactly.      6 Q. What he put you through with Miranda?      7 A. Yeah.      8 Q. What he put you through with Brie?      9 A. Yeah. Just all of it.      10 Q. So Marie sided with you?      11 A. Sided with me? I don't know if she sided      12 with me. She just, kind of -- she didn't want to see      13 what happened happen. She didn't want to see us, you      14 know, get divorced and she didn't want -- so she tried      15 to not side with me but, kind of, like, talk to him,      16 talk some sense into him. And that's --      17 Q. How did that turn out?      18 A. Not good.      19 Q. Okay. And were they estranged up until the      20 time Phil paid her mortgage off in January?      21 A. I don't know. I can't -- I can't say      22 exactly. I don't know.      23 Q. Do you let Marie see your boys?      24 A. Yes.      25 Q. Do you talk to Marie often?</p>	<p style="text-align: right;">Page 36</p> <p>1 A. Yes, I followed Phil before. Yeah.      2 Q. And did you see him meet her?      3 A. No.      4 Q. How many times did you follow him?      5 A. I don't -- I don't know.      6 Q. Was this before he was charged with crimes?      7 A. Yeah.      8 Q. This was before he lost his job at the high      9 school as a baseball coach?      10 A. Probably, yeah.      11 Q. Do you remember that they asked him to step      12 down as a baseball coach because of the situation with      13 Brie?      14 A. I do remember that, yeah.      15 Q. Was it Principal Moceyunas that asked him to      16 step down?      17 A. I can't remember who it was exactly. I just      18 know that they asked him to do that.      19 Q. Because Brie's mother wrote a letter to the      20 school?      21 A. School, yeah.      22 Q. And in the letter, there's photos of the      23 \$2,800 earrings that Phil bought for Brie?      24 A. Oh, I don't know about that. I know there      25 was photos.</p>
<p style="text-align: right;">Page 35</p> <p>1 A. Yes.      2 Q. Is she a good friend of yours?      3 A. She is.      4 Q. Well, and give me an idea. Is that about the      5 time they became friends again?      6 A. I would say.      7 Q. And Phil paid off \$172,000 mortgage for his      8 mom?      9 A. Yes.      10 Q. And for her second husband Tom, right?      11 A. They're not married, but yes.      12 Q. They're not?      13 A. Yeah.      14 Q. What's Tom's last name?      15 A. Holland.      16 Q. Did you, obviously, confide in Marie that      17 Phil cheated on you?      18 A. Oh, yeah. She knew, yeah.      19 Q. She knew. She knew about Miranda?      20 A. Yeah.      21 Q. She knew about Brie?      22 A. She knew the whole situation that was going      23 on with Brie, yeah.      24 Q. Did you ever follow Phil to see if he was      25 going to meet Brie?</p>	<p style="text-align: right;">Page 37</p> <p>1 Q. How about Miranda Polidori? Didn't she send      2 you a text message about her relationship with Phil?      3 A. She did, yes.      4 Q. Do you still have it?      5 A. No.      6 Q. You sure?      7 A. Yeah.      8 Q. Okay. What did the text message say?      9 A. Everything that I was -- something about      10 everything that I was questioning is true. And I just      11 said, well, what does that mean? And she had sent me      12 pictures of the two of them together and said that I had      13 went away to the beach with a friend overnight and he      14 had taken my kids with her to a mall while I was at the      15 beach overnight. And that was, pretty much, our      16 conversation.      17 Q. I want to go back to the transcript of      18 February 6, 2023, the hearing in front of Judge Minora.      19 It's a tab in the back. And I want to turn to Page 86.      20 And I asked the question on Line 6, "So and you're      21 married at the time that you're now in a sexual      22 relationship with her..." meaning Brie. He's pinned      23 2015 now, the year [REDACTED] was born.      24 A. Uh-huh.      25 Q. And his answer was, "We were, kind of, on the</p>

<p style="text-align: right;">Page 38</p> <p>1 outs of our marriage. We weren't separated, but we were    2 having some severe problems in our marriage." Is that    3 true, were you having severe problems in 2015, the year    4 [REDACTED] was born?</p> <p>5 A. No. No.</p> <p>6 Q. Okay. And the next question, "She filed for    7 divorce in March of 2021?" Answer: "Yes." Question:    8 "She never filed before then? Dori I'm talking about."    9 Answer: "Almost, but no." When did you almost file for    10 divorce before you actually did in March of 2021?</p> <p>11 A. Probably 2017. I think it was 2017, I    12 reached out to Brian Cali.</p> <p>13 Q. Okay. And was that during the Miranda    14 Polidori situation?</p> <p>15 A. Yes.</p> <p>16 Q. And then you went away on vacation with Phil    17 and you dropped it?</p> <p>18 A. Yeah.</p> <p>19 Q. But you weren't having any problems in 2015    20 when he was having sex with Brie?</p> <p>21 A. No. No.</p> <p>22 Q. And he never admitted to having any sex with    23 Brie?</p> <p>24 A. No.</p> <p>25 Q. Were you and Phil planning to move to Boston</p>	<p style="text-align: right;">Page 40</p> <p>1 was actually in ninth grade at the time. Did Phil tell    2 you ever about the call he got from Principal Moceyunas?    3 A. No. The only one that I knew about was when    4 they asked him to step down.</p> <p>5 Q. Okay. He didn't voluntarily resign, they    6 asked him to step down?</p> <p>7 A. I think so, yeah. I don't really remember.    8 I want to say they asked him to. I don't know.</p> <p>9 Q. Okay. So in January of 2009 when Brie is a    10 freshman at Riverside, are you aware that he's talking    11 to her at that time?</p> <p>12 A. I don't remember when I became aware of it.    13 I don't remember exactly when.</p> <p>14 Q. How did you first learn that he was talking    15 to Brie?</p> <p>16 A. I don't know. I don't remember how I -- I    17 don't remember if someone said something. I don't know.    18 I don't remember how I figured it out.</p> <p>19 Q. Did you ever read his text messages on his    20 phone?</p> <p>21 A. Never.</p> <p>22 Q. Did you ever -- was he acting strangely or    23 suspiciously that there might be another woman in the    24 picture?</p> <p>25 A. I don't -- I don't know. I mean, I don't</p>
<p style="text-align: right;">Page 39</p> <p>1 to try and save your marriage at one point in time?</p> <p>2 A. Yes.</p> <p>3 Q. What year was that?</p> <p>4 A. 2017, 2018. It was shortly after the whole    5 Miranda thing.</p> <p>6 Q. And you thought maybe a fresh start would    7 help your situation?</p> <p>8 A. At first, yeah. Yeah.</p> <p>9 Q. Then you didn't move to Boston?</p> <p>10 A. No.</p> <p>11 Q. Did you realize there were still problems in    12 the marriage?</p> <p>13 A. Yeah. And I'm just very close to my family    14 and I couldn't do it. I just couldn't go.</p> <p>15 Q. Okay. Can we turn to Page 513 -- ST513?</p> <p>16 This is a memo that Principal Moceyunas at Riverside    17 High School wrote. And he's already testified in this    18 case, Dori. And just to put this in significance,    19 Brie's a freshman in high school at the time of this    20 memo from Principal Moceyunas.</p> <p>21 A. Okay.</p> <p>22 Q. January 8th, 2009, Principal Moceyunas called    23 Phil on the morning of January 8th, 2009 and spoke to    24 him about some rumors that were going around the school    25 about he and another female student in tenth grade. She</p>	<p style="text-align: right;">Page 41</p> <p>1 think so, no. There was one night that he went out and    2 I had a lot of questions and he said he was with a    3 friend and I asked that friend and he was with that    4 friend. So I don't know. Not really.</p> <p>5 Q. Was his friend his uncle or was it his friend    6 that covered for him?</p> <p>7 A. No, he was a friend at the time.</p> <p>8 Q. Who was it?</p> <p>9 A. Tim -- I don't even remember his last name.</p> <p>10 I don't know.</p> <p>11 Q. Did Phil -- you're engaged at this time    12 period in 2009, correct?</p> <p>13 A. Yeah.</p> <p>14 Q. You're not married?</p> <p>15 A. Not married.</p> <p>16 Q. And did Phil blame Brie's parents for him    17 losing his job at Riverside High School as a baseball    18 coach?</p> <p>19 A. I don't -- I don't know. I don't think so.</p> <p>20 Q. He never said that to you?</p> <p>21 A. No.</p> <p>22 Q. Well, in 2009 around the time he lost his job    23 as the baseball coach, did he ever talk to you about    24 Brie, some young girl that's in love with him or    25 something?</p>

<p style="text-align: right;">Page 42</p> <p>1 A. Not that she was in love with him, No.</p> <p>2 Q. What did he tell you?</p> <p>3 A. That he was helping her. She was friends</p> <p>4 with Joe Strok, who had passed away and -- well, she was</p> <p>5 boyfriend -- girlfriend with Joe. And she was in a real</p> <p>6 bad spot and he was her friend.</p> <p>7 Q. Had you ever met Joe?</p> <p>8 A. Me? No.</p> <p>9 Q. Did Phil ever talk about Joe?</p> <p>10 A. No.</p> <p>11 Q. Did you ever know Joe and Phil to be friends?</p> <p>12 A. No.</p> <p>13 Q. So you had been with Phil since 2005?</p> <p>14 A. Correct.</p> <p>15 Q. Up until the time Joe died -- let's get that</p> <p>16 on paper here. We're going to turn to Page 1538. So</p> <p>17 this is on ST1538, a obituary for Joseph Stroke. Do you</p> <p>18 see that?</p> <p>19 A. Yes.</p> <p>20 Q. And he died on November 10th, 2008. There's</p> <p>21 a picture of him there. Had you ever met Joe Strok?</p> <p>22 A. No.</p> <p>23 Q. And up until the time of his death, did Phil</p> <p>24 Godlewski ever mention the name Joe Strok to you?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 44</p> <p>1 check. You see that?</p> <p>2 A. Yeah.</p> <p>3 Q. And Phil ultimately pled guilty to bouncing</p> <p>4 that check in February of 2021 and then he was sentenced</p> <p>5 to jail in June of 2021, correct?</p> <p>6 A. Correct.</p> <p>7 Q. And what did that do to Phil's reputation as</p> <p>8 a Realtor in the local community?</p> <p>9 A. I don't -- I don't know. I don't think it</p> <p>10 really did anything.</p> <p>11 Q. Did any of your fellow Realtors bring it up</p> <p>12 to you at all?</p> <p>13 A. No.</p> <p>14 Q. Any of your good friends talk to you about</p> <p>15 Phil and his criminal charges in the Mariotti case?</p> <p>16 A. Not really, no.</p> <p>17 Q. Did Phil -- strike that.</p> <p>18 Did you ever receive any information as</p> <p>19 to why Phil left his employment at ERA One Source?</p> <p>20 A. Yeah.</p> <p>21 Q. What do you know?</p> <p>22 MR. BOWERS: Objection. Time frame.</p> <p>23 Spousal communication.</p> <p>24</p> <p>25</p>
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<p>1 A. But yes, we did.</p> <p>2 Q. Nobody put up a cash bail, it was the homes,</p> <p>3 the deeds, correct?</p> <p>4 A. I think so, yeah.</p> <p>5 Q. Well, let's look at ST776, it actually starts</p> <p>6 on 775, Cutting Edge Bail Bonds, LLC. They filed a</p> <p>7 collateral mortgage and it's signed by Philip Godlewski</p> <p>8 and Dorothea Gallagher. Do you see that?</p> <p>9 A. Uh-huh.</p> <p>10 Q. And did you sign this collateral mortgage to</p> <p>11 make bail for Phil?</p> <p>12 A. Yes.</p> <p>13 Q. Do you have any knowledge of Phil putting up</p> <p>14 any cash to get out of jail?</p> <p>15 A. I remember us all, kind of, getting money</p> <p>16 together to try to get him out. I don't remember the</p> <p>17 exact details of how -- what went to what and -- it was</p> <p>18 a crazy time.</p> <p>19 Q. Crazy time.</p> <p>20 A. Yeah.</p> <p>21 Q. And how much money did you and certain other</p> <p>22 people get together to get him out?</p> <p>23 A. I honestly don't remember exactly how much</p> <p>24 money. I don't know.</p> <p>25 Q. Did you have to put up any money to pay a</p>	<p>1 doing them?</p> <p>2 A. Occasionally, yeah.</p> <p>3 Q. Before you left the home in February, you</p> <p>4 asked him to stop; didn't you?</p> <p>5 A. Yes.</p> <p>6 Q. You told him that he was misleading people;</p> <p>7 didn't you?</p> <p>8 A. I don't know what I said. But yes, I asked</p> <p>9 him to stop. Yeah.</p> <p>10 Q. Why did you ask him to stop?</p> <p>11 A. I just didn't like --</p> <p>12 MR. BOWERS: Objection. Spousal</p> <p>13 testimony. Privilege.</p> <p>14 BY MR. HINTON:</p> <p>15 Q. Phil was gaining in popularity after the</p> <p>16 election in November of 2020 between Biden and Trump</p> <p>17 with his social media videos, his followers were</p> <p>18 growing?</p> <p>19 A. If I'm being honest, I wanted nothing to do</p> <p>20 with it. I didn't follow it. I didn't -- I don't know.</p> <p>21 Q. You thought the Q movement was a cult,</p> <p>22 correct?</p> <p>23 A. Yeah. I -- yeah.</p> <p>24 Q. And it scared you?</p> <p>25 A. Yes.</p>
Page 47	Page 49
<p>1 lawyer for Phil?</p> <p>2 A. I believe we did, yeah. We had to -- we had</p> <p>3 to come up with money, yeah.</p> <p>4 Q. Who is the "we"?</p> <p>5 A. Me and Phil.</p> <p>6 Q. You and Phil?</p> <p>7 A. Yeah.</p> <p>8 Q. Was it Phil's grandfather, Osmolia?</p> <p>9 A. Oh, he gave money towards all of this, yeah.</p> <p>10 Q. How much did he put up?</p> <p>11 A. I don't remember. It was, kind of, just</p> <p>12 everybody.</p> <p>13 Q. How many nights did Phil spend in jail</p> <p>14 because of the charges involving Brie?</p> <p>15 A. I don't remember.</p> <p>16 Q. Dori, am I correct that you've watched --</p> <p>17 reading your custody transcript -- and it came up a</p> <p>18 lot -- the videos Phil was doing before you left the</p> <p>19 home and filed for divorce.</p> <p>20 A. Did I watch them?</p> <p>21 Q. Yes.</p> <p>22 A. No.</p> <p>23 Q. Okay.</p> <p>24 A. I --</p> <p>25 Q. Would walk through the room while he was</p>	<p>1 Q. And you asked Phil to stop?</p> <p>2 A. Yes.</p> <p>3 MR. BOWERS: Objection. Spousal</p> <p>4 privilege.</p> <p>5 BY MR. HINTON:</p> <p>6 Q. When you walked out of the house -- do you</p> <p>7 remember the exact day you walked out of the house and</p> <p>8 went to Melissa's?</p> <p>9 A. Yeah. Date? No. The day, yeah.</p> <p>10 Q. Okay. What day of the week was it?</p> <p>11 A. I want to say it was either a Tuesday or a</p> <p>12 Thursday.</p> <p>13 Q. All right. When you walked out of the house</p> <p>14 in February of 2021, Phil was still doing social media</p> <p>15 videos at that time; was he not?</p> <p>16 A. I believe he was, yes.</p> <p>17 Q. And you had asked him to stop?</p> <p>18 A. Yes.</p> <p>19 Q. Were you aware that Phil -- in one of Phil's</p> <p>20 videos, he claimed Hillary Clinton is a pedophile?</p> <p>21 A. No.</p> <p>22 Q. Are you aware that he's claiming all of these</p> <p>23 high-level Democrats are pedophiles?</p> <p>24 A. Yeah. I've heard of that, yes.</p> <p>25 Q. What do you think of these statements?</p>

	Page 50		Page 52
1	A. I don't know. I -- I don't know.	1	A. Yeah.
2	Q. Do they seem crazy to you?	2	Q. Arizona?
3	A. Yeah.	3	A. Arizona.
4	Q. Did you see the video or hear about the video	4	Q. How much there; over a million?
5	where Phil claimed Hillary Clinton was executed after a	5	A. Probably. I don't know.
6	military tribunal?	6	Q. Nevada?
7	A. I did not hear that.	7	A. I know that he has one there, yes.
8	Q. How about the real Joe Biden? I think you	8	Q. How much was that?
9	know this one. The real Joe Biden was executed for	9	A. I don't know.
10	crimes against humanity in 2019 and the Joe Biden that	10	Q. How about Shavertown?
11	was elected in November of 2020 is really a body double.	11	A. Shavertown was 1.2, I think.
12	Did you hear that?	12	Q. 1.7. You were the Realtor on that one.
13	A. I've heard that one, yes.	13	A. 1.7. Okay. Yes.
14	Q. What do you think of that one?	14	Q. How did it come to be that you were the
15	A. I think it's crazy. I don't know.	15	Realtor on that one?
16	Q. You don't believe it; do you?	16	A. So he had asked me -- he said that he was
17	A. No, I don't believe it. No.	17	going to buy a new house and he was going to give me
18	Q. And you think he's lying to people; is that	18	Huckleberry and he asked if I wanted to be his agent.
19	correct?	19	Q. Did you gain the commission?
20	A. Yeah.	20	A. Yeah.
21	Q. And he's doing it on social media to gain	21	MR. WILLIAMS: Hold on. Is this while
22	followers, correct?	22	you were married?
23	A. Yeah.	23	THE WITNESS: Correct.
24	Q. And the more followers he has, the more money	24	MR. HINTON: I'll move on.
25	he makes by selling stuff to those followers; is that	25	BY MR. HINTON:
1	correct?	1	Q. So let me get this straight. So Phil is
2	A. Seems like it, yeah.	2	making millions of dollars per year now to buy all of
3	Q. And he's making a lot of money, right?	3	this real estate, correct?
4	A. Yeah.	4	A. Correct.
5	Q. How much money do you think he's making per	5	Q. When you left Phil in February of 2021, what
6	month right now?	6	was your financial condition at that time?
7	A. I couldn't even begin to guess.	7	A. Not good.
8	Q. Well, you had to have some idea when you	8	Q. When he wrote the bad check -- or the bad
9	agreed to \$12,500 a month in alimony; is that correct?	9	check that led to the criminal charges involving
10	A. Yeah, I guess.	10	Mariotti lumber, the police indicated that you and Phil
11	Q. Is he making over a hundred thousand dollars	11	had about 200-some-odd dollars in your bank account at
12	a month?	12	that time; is that accurate?
13	A. Probably.	13	A. Probably. I never really monitored our bank
14	Q. Is he making over \$300,000 a month?	14	account, so I don't know.
15	A. Probably.	15	Q. Okay. Did you have investments when you were
16	Q. Is he making over a million dollars a month?	16	married? When you were living with Phil in February of
17	A. I don't know about that.	17	2021, did you have investments?
18	Q. Well, you know about the real estate he's	18	A. No.
19	bought, right?	19	Q. Did you have a bank account with more than
20	A. Yes.	20	\$10,000 in it?
21	Q. Where did he buy homes?	21	A. When I left?
22	A. Hawaii, St. Thomas.	22	Q. Yeah.
23	Q. 7.5 million in Hawaii?	23	A. No.
24	A. Yes.	24	Q. Would you say that you were in very bad
25	Q. St. Thomas, almost three million?	25	financial condition at the time you left?

14 (Pages 50 - 53)

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<p>1 A. At the time I left, yeah. It wasn't good, 2 yeah.</p> <p>3 Q. And now he's doing much better?</p> <p>4 A. Yeah.</p> <p>5 Q. And now you're doing much better?</p> <p>6 A. Yeah.</p> <p>7 Q. Am I correct that the reasons you filed for 8 divorce would be Phil refusing to stop the QAnon videos? 9 That's one of the reasons; is that correct?</p> <p>10 A. Probably, yeah.</p> <p>11 Q. Another reason was his infidelity to you, 12 cheating on you?</p> <p>13 A. Yeah.</p> <p>14 Q. Am I also correct that the two of you just 15 weren't happy together anymore?</p> <p>16 A. Yeah.</p> <p>17 Q. And all of those reasons for the divorce 18 predated the article that appeared on Valentine's Day of 19 2021; is that correct?</p> <p>20 A. Yeah.</p> <p>21 Q. So the article that is in focus in this 22 lawsuit is in the documents I have in front of you. I 23 want to ask you if you ever read it. 3721. Dori, did 24 you ever read the Scranton Times article marked as 3721 25 through 3723?</p>	<p>1 and the cabal. You knew all about that?</p> <p>2 A. Bits of it, yes.</p> <p>3 Q. And it scared you?</p> <p>4 A. Yeah.</p> <p>5 Q. And you didn't believe in it?</p> <p>6 A. No.</p> <p>7 Q. So you were Phil's wife at the time and he 8 couldn't even convince you to believe in this QAnon 9 nonsense?</p> <p>10 A. No.</p> <p>11 Q. And one of the reasons you had sought 12 supervised custody only for Phil and your two boys was 13 because of his QAnon beliefs; is that correct?</p> <p>14 A. Yeah. Yeah.</p> <p>15 Q. Did you know that Phil was charged with and 16 pled guilty to more misdemeanor crimes for applying for 17 a gun and lying on the application to get a gun in 18 February of 2021?</p> <p>19 A. I was aware of that, yes.</p> <p>20 Q. So the guns that he applied for to get a 21 license for or purchase -- and he got charged for it -- 22 did he actually get those guns, the AR-15 and the 23 handgun?</p> <p>24 A. I'm not sure.</p> <p>25 Q. Did he ever buy a handgun for you?</p>
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<p>1 A. Yes.</p> <p>2 Q. When did you read it?</p> <p>3 A. Probably the day it was in the paper, I would 4 say.</p> <p>5 Q. And the headline of it is QAnon Realtor Has a 6 Deal For Gullible, correct?</p> <p>7 A. Uh-huh.</p> <p>8 Q. And is that a fair thing to call him, a QAnon 9 Realtor? He's a Realtor and he's a proponent of the Q 10 movement?</p> <p>11 A. Yeah.</p> <p>12 Q. And from what you knew of QAnon up to the 13 time of this article, you thought it was a cult, 14 correct?</p> <p>15 A. Yeah.</p> <p>16 Q. And their focus was on child sex trafficking 17 and people that are drinking blood from children to get 18 the adrenochrome out of the blood, right? That's what 19 you knew about it?</p> <p>20 A. Yeah. I know there are things, you know, 21 that -- I don't know -- our government was corrupt and 22 all that stuff.</p> <p>23 Q. And Trump is the savior?</p> <p>24 A. Yeah.</p> <p>25 Q. And there's the Great Awakening and The Storm</p>	<p>1 A. No.</p> <p>2 Q. Have you ever seen a handgun in your house?</p> <p>3 A. No.</p> <p>4 Q. Did Phil ever own an AR-15?</p> <p>5 A. I don't know. Not when I was with him.</p> <p>6 Q. You know an AR-15 has a magazine in it and 7 you can shoot, you know, automatic shots?</p> <p>8 A. I know nothing about guns. All I know is 9 that when we were together, he never had a gun.</p> <p>10 Q. Okay. Did he ever have a gun that he showed 11 to your children in a video?</p> <p>12 A. Yes.</p> <p>13 Q. Whose gun was that?</p> <p>14 A. I believe it was his.</p> <p>15 Q. Was that after you had left the house?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. So after you left the house. Was it 18 before you filed for divorce?</p> <p>19 A. Yes.</p> <p>20 Q. So you filed for divorce March 8th?</p> <p>21 A. Something like that, yeah.</p> <p>22 Q. Okay. So you left the house a few days after 23 the article?</p> <p>24 A. Uh-huh.</p> <p>25 Q. Yes?</p>

15 (Pages 54 - 57)

Page 58		Page 60
1 A. Yes.		1 Q. Were you with Phil when he read this article
2 Q. And then you filed for divorce a few weeks		2 for the first time?
3 later?		3 A. No.
4 A. Yes.		4 Q. Was he not home?
5 Q. So during that few-week period of time, Phil		5 A. I wasn't home.
6 had possession of a gun?		6 Q. You weren't home. Okay. Did you have a
7 A. Yes.		7 Scranton Times delivered to your home or did he read it
8 Q. A rifle? Was it a big gun?		8 on the Internet?
9 A. It was a big gun.		9 A. The Internet.
10 Q. It wasn't a pistol?		10 Q. And what was his mood or affect when you got
11 A. No. It was a big gun.		11 home and you talked about the article?
12 Q. And he was showing it to your older son		12 A. Not happy.
13 [REDACTED]?		13 Q. Up until the time that this article came out,
14 A. My younger son.		14 I'm correct that Phil never admitted to you that he had
15 Q. Your younger son?		15 slept with Brienna DuBorgel before?
16 A. Yes.		16 A. No.
17 Q. The one born in 2017?		17 Q. Did Phil ever tell you why he pled guilty to
18 A. Yes.		18 corrupting the morals of Brie?
19 Q. So he would have been about four years old		19 A. Yeah.
20 and he's showing him a gun?		20 MR. BOWERS: Objection. Lay a time
21 A. Yes.		21 frame for the question.
22 Q. Did you have concerns about that?		22 MR. HINTON: We all know it's before the
23 A. Yes.		23 marriage. He pled guilty in July of 2011, okay?
24 Q. When you read this article about Phil in the		24 MR. BOWERS: Statements made before or
25 Scranton Times marked as ST3721 through 3723, did you		25 after, so I just wanted to lock that down.
Page 59		Page 61
1 have a conversation with Phil about the article?		1 BY MR. HINTON:
2 A. Yes.		2 Q. When Phil pled guilty in July of 2011 to
3 MR. HINTON: And if I asked you		3 corrupting Brie, did he tell you why he was pleading
4 questions about Phil's statements to you about the		4 guilty?
5 article, Mr. Bowers, are you going to assert privilege		5 A. I mean, I was part of the decision. So I was
6 and --		6 there, yeah.
7 MR. BOWERS: Yes, we are.		7 Q. Okay. And who was there at the time of this
8 MR. HINTON: -- not allow me to ask		8 decision?
9 those questions?		9 A. Me, his grandfather, his mother, his dad. I
10 MR. BOWERS: I am indeed.		10 can't remember exactly everybody, but that was, pretty
11 MR. HINTON: Okay. And just to get it		11 much, the...
12 on the record, Mr. Bowers, are you going to object to		12 Q. Were you at the courthouse?
13 any questions I ask this witness about statements Phil		13 A. Yes.
14 has made to her while they were still married about this		14 Q. I want you to turn to ST20, if you could,
15 article?		15 please. This is the newspaper article that came out the
16 MR. BOWERS: I am, unless a proper		16 day after Phil pled guilty to corruption. And this
17 foundation is laid that those statements would have been		17 article's dated July 12th, 2011. And in the fourth
18 made in the presence of other parties, thereby,		18 column of that article, it says, "Among the evidence
19 destroying the privilege.		19 against him were thousands of text messages between Mr.
20 MR. HINTON: Okay.		20 Godlewski and the girl in which he explicitly described
21 BY MR. HINTON:		21 their sexual exploits and expressed how much he cared
22 Q. Did Phil make any statements to you about the		22 about her, according to the affidavit." Do you see
23 Scranton Times article written by Chris Kelly in the		23 that?
24 presence of anybody else, a third party?		24 A. Uh-huh.
25 A. Not that I can remember.		25 Q. You have to say yes.

16 (Pages 58 - 61)

	Page 62		Page 64
1 A. Yes. Sorry.		1 about why Phil should take the deal -- did anybody ask	
2 Q. Did Phil ever show you the actual text		2 Phil what did you actually do to corrupt Brie?	
3 messages between him and Brie?		3 A. No.	
4 A. Never.		4 Q. That never came up?	
5 Q. Did he ever talk to you about those text		5 A. No.	
6 messages at all?		6 Q. Well, what was your understanding as to why	
7 A. No.		7 he was admitting to a crime that had three years of	
8 Q. And the article then continues, It says, "On		8 incarceration or electronic monitoring and two years of	
9 Monday, Mr. Godlewski waived his right to a preliminary		9 probation? Why was he admitting to something if he	
10 hearing in the case." Is that what happened at the		10 didn't do it?	
11 courthouse the day before, he waived his hearing and		11 A. We just wanted it over. I mean, he was	
12 pled guilty?		12 facing a lot of time and we just -- we just wanted -- we	
13 A. Yeah. Yeah.		13 wanted it to go away; we just wanted it to go away.	
14 Q. Okay. You were in these family discussions		14 Q. Well, did you ever ask Phil -- you lived with	
15 about what we're going to do?		15 him at the time, but did you ever ask him, were you ever	
16 A. Yes.		16 alone with the girl? Did you ever kiss her? Did you	
17 Q. And one of those decisions that was made in		17 ever have any physical contact with her? Didn't you ask	
18 this group decision was that he waived his preliminary		18 those questions?	
19 hearing; is that correct?		19 A. No. I believed that they were friends. I	
20 A. Yeah. I mean, we just -- I guess that's what		20 just -- I talked to her about it.	
21 it meant, yeah.		21 Q. Talked to who?	
22 Q. Were you in the courtroom when one of the		22 A. Brie; I talked to Brie about it.	
23 detectives provided the stack of text messages -- or the		23 Q. Back then?	
24 prosecutor provided the stack of text messages to the		24 A. Back then.	
25 judge that was hearing the preliminary hearing?		25 Q. What did you talk about?	
	Page 63		Page 65
1 A. I don't think any of that was -- even		1 A. I just had asked her, like, what exactly is	
2 happened.		2 going on. She said they were friends. Like, he was a	
3 Q. Okay. Nobody testified, nothing happened, he		3 big brother to her. That's what she told me.	
4 just waived the hearing?		4 Q. He was over ten years older than her.	
5 A. No. Brie was on the stand.		5 A. Yeah.	
6 Q. Brie was on the stand and then he waived the		6 Q. Did you think it was weird that he was	
7 preliminary hearing after Brie was on the stand?		7 friends with somebody more than ten years younger than	
8 A. Brie was on the stand and we -- I don't know.		8 him?	
9 We all left the courtroom after she left the stand, pled		9 A. Yeah and no. I did tell him he should be	
10 the Fifth Amendment and we all went outside and		10 careful. I don't know. I was young myself, honestly.	
11 discussed, you know, what they were offering and -- it		11 Q. Did you ever know what -- do you know whether	
12 was crazy. I don't know.		12 Phil ever attended an online program at Harvard	
13 Q. But, Dori, after you left the courtroom --		13 University?	
14 the hearing's not over yet, you just took a break in the		14 A. I don't know that, no.	
15 hearing, correct?		15 Q. Did you have a joint checking account?	
16 A. I don't know. Maybe. I guess that's what		16 A. Yes.	
17 happened. I don't --		17 Q. Did you ever see any payments to Harvard	
18 Q. Did you then go back in the courtroom and		18 University for an online program?	
19 waive the preliminary hearing?		19 A. I didn't really follow our bank account very	
20 A. I don't know. I don't -- I guess. I don't		20 closely. But no, I did not.	
21 know. I don't remember. It was -- I just know that he,		21 Q. Do you have any information or knowledge that	
22 you know, took that deal. That's what I remember.		22 he attended a program a Regent University?	
23 Q. Took the deal?		23 A. No.	
24 A. Yeah.		24 Q. And from the time you met Phil in 2005 until	
25 Q. And did anybody in this group conversation		25 the time of the criminal charges in July of 2010, where	

Page 66	Page 68
1 did Phil work during those five years?	1 difficult time.
2 A. Say that again. Which --	2 Q. And was there television news coverage of the
3 Q. From 2005 when you met Phil.	3 sex crime case against Phil?
4 A. Yeah.	4 A. The day he was arrested, I remember there
5 Q. You started living with him, right?	5 was, yeah.
6 A. Yeah. Well, shortly after that, yeah.	6 Q. Like, all three networks covered it?
7 Q. And then until the time of the criminal	7 A. Yeah.
8 charges when he got charged with all the sex crimes,	8 Q. Pretty bad, right?
9 2010 --	9 A. Yeah.
10 A. Okay.	10 Q. And could you tell that everybody in the
11 Q. -- where did Phil work during that five-year	11 local community knew about it?
12 period of time?	12 A. Oh, yeah.
13 A. At his family's gas station and as a real	13 Q. And what did that do to Phil's reputation?
14 estate agent for Lewith & Freeman.	14 A. I honestly think that a lot of people at
15 Q. Who was the broker at --	15 first didn't believe it. It didn't really do much to
16 A. Marion Gatto was our broker for our office.	16 his reputation in the beginning. He was well-known in
17 Q. Did he work anywhere else?	17 real estate, he was well-known in the community. A lot
18 A. No, I don't think so.	18 of people reached out to me and asked what they could do
19 Q. So looking at these news articles, they start	19 to help, honestly.
20 on ST18. This is a news article from November 13th,	20 Q. Do you remember when Phil started the agency
21 2010. Do you see that date on that?	21 with George Plisko, that some unknown person sent a
22 A. Uh-huh.	22 packet of news articles to every resident in Lackawanna
23 Q. So about --	23 County --
24 MR. WILLIAMS: Is that a yes?	24 A. Yes.
25 THE WITNESS: Oh, sorry. Yes.	25 Q. -- including these news articles that we just
Page 67	Page 69
1 BY MR. HINTON:	1 went over trying to bring Phil down?
2 Q. So about four months after Phil is charged on	2 A. I'm not sure it was the same articles. But
3 July 9th of 2010, he's agreed to plead guilty to a	3 yes, I do remember articles going around.
4 corruption charge, okay? The preliminary hearing	4 Q. And how did that affect Phil's reputation?
5 involving Brie is in July of 2011. Do you remember that	5 A. I don't know. I don't -- I think they tried
6 Phil initially agreed to plead guilty and then he	6 to do something that didn't really work. His business
7 withdrew that plea and then we had the preliminary	7 seemed to do really well after that. I don't know.
8 hearing and he agreed to plead guilty again? Do you	8 Q. Okay. How about the Chris Kelly article?
9 remember that situation?	9 One article about his QAnon but mentions his criminal
10 A. Not really.	10 past involving Brie; how did that affect his reputation?
11 Q. Okay. So we have the article marked as ST18	11 A. That was different because I feel like a lot
12 and then here's another article, ST19, Taylor Team Wants	12 of people had forgotten about all of that. He wasn't
13 its Gear From Seized Car. Did you see these articles	13 charged with having sex with her.
14 when they were published?	14 Q. He was not charged with having sex with her?
15 A. I may have. I'm sure I did, yeah.	15 A. No. At least that's -- you know.
16 Q. And then we have the article from July 12th,	16 Q. You weren't aware that he was charged with
17 ST20, where Ex-Baseball Coach Sentenced For Sex With	17 statutory rape?
18 Girl 15.	18 A. No.
19 A. Uh-huh.	19 Q. Okay. He was charged with a bunch of
20 Q. What was your reaction to the headline?	20 felonies. Don't you remember that?
21 A. I don't remember. I don't know.	21 A. Yeah, but I'm saying, his sentence was for
22 Q. Well, did you have any problem with the	22 that. Like, he didn't -- the charges didn't stick. So
23 headline?	23 like --
24 A. I don't -- I had a problem with everything	24 Q. You know the difference between what you're
25 that was going on, so I'm sure I did. It was a very	25 charged with and then what you ultimately plead to,

<p style="text-align: right;">Page 70</p> <p>1 right, a plea bargain?</p> <p>2 A. Yeah.</p> <p>3 Q. He got a good deal, right?</p> <p>4 A. I guess, yeah.</p> <p>5 Q. Did Phil ever tell you that he -- before you 6 got married to him in 2012, did Phil ever tell you that 7 he thought all these text messages in the criminal case 8 involving Brie was made up by young girls?</p> <p>9 A. Yes.</p> <p>10 Q. That they were fabricated?</p> <p>11 A. Yes.</p> <p>12 Q. Did he tell you what proof he had that they 13 were fabricated back then?</p> <p>14 A. I don't remember.</p> <p>15 Q. When you left Phil in February of 2021, were 16 you in bad shape mentally?</p> <p>17 A. No, I don't believe so.</p> <p>18 Q. Did Phil ever tell you that he's glad that 19 you left him?</p> <p>20 A. No.</p> <p>21 Q. Turn to ST1042, if you could, please. The 22 top text message is from Phil to Brie on March 31st, 23 2021 where he writes, "I'm glad she's gone but I want 24 the boys back. It kills me not having them here every 25 day." Do you see that?</p>	<p style="text-align: right;">Page 72</p> <p>1 miserable. She wasn't even really a great mother."</p> <p>2 What's your reaction to that?</p> <p>3 A. If I wasn't a great mother, I'm not really 4 sure who is because I literally did everything for our 5 kids.</p> <p>6 Q. Okay. When Phil pled guilty to corrupting 7 Brie in 2011, did your family members talk to you about 8 that; your parents, your siblings?</p> <p>9 A. When he was arrested, yeah. Yeah.</p> <p>10 Q. And what did they say to you about it?</p> <p>11 A. I was crazy for staying.</p> <p>12 Q. You stayed with him anyways?</p> <p>13 A. I did.</p> <p>14 Q. When you were married to Phil, did you ever 15 have a security detail or security guards guarding you 16 and Phil and the boys?</p> <p>17 A. No.</p> <p>18 Q. Did Phil ever tell you during the time you 19 lived together with Phil all those years from what, 2007 20 or '8 up until February of 2021, did he ever mention to 21 you that he has a security detail looking out for him 22 because he's a covert operative?</p> <p>23 A. No.</p> <p>24 Q. Did he ever tell you during all those years 25 you lived with Phil that he did secret missions, covert</p>
<p style="text-align: right;">Page 71</p> <p>1 A. Yep.</p> <p>2 Q. Was that how he reacted to you leaving, that 3 he's glad you left him?</p> <p>4 A. No.</p> <p>5 Q. Did he ever say those words to you, that he's 6 glad you left?</p> <p>7 A. No.</p> <p>8 Q. Go to the page right before it, ST1041. Phil 9 wrote to Brie, the bottom text message. On March 31st, 10 2021 Phil wrote to Brie -- I don't know what that 11 first -- meh.</p> <p>12 A. Meh.</p> <p>13 Q. What does that mean?</p> <p>14 A. La.</p> <p>15 Q. La?</p> <p>16 A. Yeah.</p> <p>17 Q. "I'm good. I feel better she's gone. To be 18 honest, the sex sucked or was nonexistent." Was that 19 true or was that false?</p> <p>20 A. I mean, it was nonexistent, yeah, I'd agree 21 with that.</p> <p>22 Q. Up to the time you left, the sex was 23 nonexistent between the two of you?</p> <p>24 A. Yeah.</p> <p>25 Q. He says to Brie, "She was constantly</p>	<p style="text-align: right;">Page 73</p> <p>1 missions?</p> <p>2 A. No.</p> <p>3 Q. Are you aware that that's what he says on 4 social media?</p> <p>5 A. I've heard that he says it.</p> <p>6 Q. Do you think it's a bunch of lies?</p> <p>7 A. Yeah.</p> <p>8 Q. Now, turning back to the guns, I want to show 9 you something on Page -- let's go to Page ST476. So 10 this is a social media post that Phil made when he was 11 in the process of interviewing law firms to sue the 12 Scranton Times. So I think it's early 2021. And I 13 don't think you've quite yet filed for divorce yet in 14 March. I want you to focus on the paragraph towards the 15 bottom that begins, "Things are very, very shaky right 16 now at best. I am very carefully navigating the waters. 17 I purchased an AR-15 today as well as a handgun for my 18 wife, both for home and personal protection. I've never 19 owned a weapon until now." So did Phil purchase a 20 handgun for you?</p> <p>21 A. No.</p> <p>22 Q. And you did realize he was on bail at the 23 time that he posted this for the Mariotti lumber case, 24 right?</p> <p>25 A. I don't -- I wasn't even aware of this --</p>

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<p>1 this post so...</p> <p>2 Q. Do you think it's a lie?</p> <p>3 A. Probably.</p> <p>4 Q. Okay. And did Phil -- in the custody transcript, did Phil talk to you after the presidential election in November about getting a gun for the house because of social unrest in the country?</p> <p>5 MR. WILLIAMS: Is this during the marriage?</p> <p>6 MR. BOWERS: We'll assert it. Why not?</p> <p>7 BY MR. HINTON:</p> <p>8 Q. They've raised the privilege so that you can't answer that question, okay?</p> <p>9 A. Okay.</p> <p>10 Q. So I have a video clip from January 20th. I can play it, but maybe you remember it. January 20th, Phil broadcast to all of his followers -- January 20, '21, Phil says, "My wife says I'm misleading people."</p> <p>11 You've already said that that's true, correct?</p> <p>12 A. Uh-huh.</p> <p>13 Q. Yes?</p> <p>14 A. Yes.</p> <p>15 Q. That you had concerns over QAnon?</p> <p>16 A. Yes.</p> <p>17 Q. And you had asked Phil to stop doing the</p>	<p>1 from?</p> <p>2 A. I want to say it was Select Motors, I think.</p> <p>3 Q. Where is Select Motors?</p> <p>4 A. They were on -- I want to say it was on Birney Avenue when I bought it -- or not Birney Avenue -- Keyser Avenue when I bought it and then he moved to Birney Avenue. I'm pretty sure that's where I got it. I had a lot of cars.</p> <p>5 Q. Okay. But you definitely had an Infiniti?</p> <p>6 A. Yes.</p> <p>7 Q. That Phil purchased for you in 2009 or 2010?</p> <p>8 A. Yeah.</p> <p>9 Q. And then your sister, Becky, she goes out with Tom Nezlo now?</p> <p>10 A. Correct.</p> <p>11 Q. And that's been going on for about five years?</p> <p>12 A. Probably, yeah.</p> <p>13 Q. Pretty serious relationship?</p> <p>14 A. Yeah.</p> <p>15 Q. And in your family and the holidays, the Gallagher family, do you get together on the holidays?</p> <p>16 A. Yes.</p> <p>17 Q. And when you and Phil were still together up until February of 2021, did Phil come with you and the</p>
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<p>1 videos?</p> <p>2 A. Yes.</p> <p>3 Q. And that you told him that Q movement was a cult?</p> <p>4 A. Yes.</p> <p>5 Q. It's also correct you didn't want your children around this cult?</p> <p>6 A. Correct.</p> <p>7 Q. You didn't want your children exposed to this cult?</p> <p>8 A. Correct.</p> <p>9 Q. Did Phil buy you an Infiniti car before he got charged with the crimes involving Brie?</p> <p>10 A. Yes.</p> <p>11 Q. Was that in 2009, 2010?</p> <p>12 A. Probably, yeah.</p> <p>13 Q. How long did you have that car for?</p> <p>14 A. I don't know. A couple years, probably.</p> <p>15 Q. He bought that for you, correct?</p> <p>16 A. Yeah. I can't remember if it was in my name or his name, but yes.</p> <p>17 Q. Do you remember what dealership he got it</p>	<p>1 boys to the Gallagher home for holidays?</p> <p>2 A. Not to my dad's. To my mother's, yes.</p> <p>3 Q. Was he not welcome at your dad's?</p> <p>4 A. Yeah.</p> <p>5 Q. Because of the way he treated you?</p> <p>6 A. Yeah.</p> <p>7 Q. The cheating?</p> <p>8 A. I guess, yeah.</p> <p>9 Q. The lying?</p> <p>10 A. Yeah.</p> <p>11 Q. And Phil would come to your mother's house on the holidays, correct?</p> <p>12 A. Yeah, or they'd come to our house. But yeah.</p> <p>13 Q. Would Tom Nezlo and Becky be there too?</p> <p>14 A. Yeah.</p> <p>15 Q. Did you ever see Tom Nezlo and Phil talk with one another?</p> <p>16 A. Nah, not really. Just, kind of, hi.</p> <p>17 Q. Okay. But they would be in each other's presence?</p> <p>18 A. Yeah.</p> <p>19 Q. They would exchange pleasantries, I guess?</p> <p>20 A. I guess.</p> <p>21 Q. Okay. And did you ever talk to Tom Nezlo about Brie?</p>

Page 78		Page 80
1 A. Never.		1 Phil was working?
2 Q. Did Phil ever tell you prior to the marriage		2 A. Yeah.
3 that Tom Nezlo was involved sexually with Brie?		3 Q. How did Phil feel about drinking, alcohol,
4 A. I don't know. I don't know if he said that		4 beer, liquor?
5 or if it came up after Tom was arrested or -- I don't		5 A. At what time?
6 know.		6 Q. Back then when he got charged with crimes
7 Q. Have you ever see Tom and Phil do any		7 involving Brie, was he a drinker or not a drinker?
8 activity together, go anywhere together?		8 A. Not really, no. I mean, we would hang out
9 A. No.		9 with our friends occasionally and stuff, but it wasn't
10 Q. Would you say they're friendly?		10 like an all-the-time kind of thing or anything like
11 A. Not really.		11 that.
12 Q. Not really?		12 Q. Did Phil take you on a cruise in 2009 or
13 A. No.		13 2010?
14 Q. Okay. During the marriage, did Phil ever		14 A. We were on -- yeah. Yeah, probably. We were
15 talk to you about Tom Nezlo?		15 on many cruises. I don't know if that's exactly when,
16 A. No.		16 but yeah.
17 MR. WILLIAMS: I mean, I agreed that I		17 Q. Did Phil like the show American Idol back
18 wasn't going to object for spousal privilege because		18 then?
19 it's actually Phil's privilege.		19 A. Yes.
20 MR. BOWERS: We're good.		20 Q. Loved it, right?
21 BY MR. HINTON:		21 A. Yeah.
22 Q. When Phil worked at Osmolia's prior to the		22 Q. Was crazy about that show?
23 criminal charges involving Brie, worked in the gas		23 A. Yeah, he did like American Idol.
24 station --		24 Q. Let me just look over my notes here. I'll
25 A. Uh-huh.		25 probably have more questions.
Page 79		Page 81
1 Q. -- did he work with his uncles there?		1 (Pause)
2 A. Yeah.		2 Did you get any information that Miranda
3 Q. Which ones?		3 Polidori received a payment from the agency?
4 A. Mickey and Pete -- Michael, Mickey, whatever.		4 A. I did know of that, yes.
5 Q. Okay. And back then before you were married,		5 Q. Did you work at the agency too?
6 did Phil at all confide in you that one of his uncles		6 A. I did.
7 with cheating on his wife?		7 Q. And did the agency pay Miranda \$11,000,
8 A. No.		8 approximately, because they fired her after she texted
9 Q. He never mentioned that Mickey or Pete were		9 you about the extramarital affair?
10 cheating on their wives?		10 A. Yes.
11 A. No.		11 Q. Did you work at a hotel up at the Moosic
12 Q. You know the insurrection that happened on		12 Mountain cleaning rooms before Phil was charged with the
13 January 6th, 2021 involving the certification of the		13 sex crimes involving Brie?
14 election, all the people got arrested for storming into		14 A. Yes.
15 the Capitol?		15 Q. And is that where Brie and her friend came to
16 A. Capitol, okay.		16 see you at work?
17 Q. Do you remember that Phil was planning to go		17 A. Yes.
18 to that on that day?		18 Q. And you really didn't want to listen to them;
19 A. No.		19 is that correct?
20 Q. Okay. Do you recall overhearing any		20 A. No.
21 conversations of Phil talking to other people about		21 Q. And she was trying to tell you that she was
22 going to the U.S. Capitol on January 6th?		22 involved in a sexual relationship with Phil who you were
23 A. No.		23 engaged to?
24 Q. Before the criminal charges involving Brie,		24 A. Yes.
25 did you ever stop by the Subway and grab a hoagie while		25 Q. And you didn't want to hear it?

21 (Pages 78 - 81)

<p style="text-align: right;">Page 82</p> <p>1 A. That was after he was arrested, so I was told 2 to stay away from her. 3 Q. Well, the detectives tried to talk to you, 4 too; didn't they? 5 A. Yes. 6 Q. And they tried to show you the text messages? 7 A. I don't think they showed me text messages. 8 Q. Let's look at ST -- back at ST621. It's in 9 the Affidavit of Probable Cause for the sex crimes. It 10 says, "On July 7th, 2010, Detective Chris Kolcharno was 11 driving past 430 Cayuga Street to check and see if there 12 was any activity at the house and he saw Dori Gallagher 13 getting into her vehicle." Do you remember being 14 approached by a detective when you were getting in your 15 vehicle? 16 A. Oh, yeah. 17 Q. "At this time, Detective Kolcharno approached 18 her and asked her if she would be willing to come to the 19 DA's office and talk to Detectives Leary and Mancuso, 20 Did he ask you that? 21 A. That's a nice way of putting it, yeah. 22 Q. And you agreed to come and came into the 23 office. Did you go to their office? 24 A. I did. 25 Q. And "Their intentions with Dori were to see</p>	<p style="text-align: right;">Page 84</p> <p>1 that I suspected something or found out they were 2 talking. I don't remember. 3 Q. You don't remember any of that? 4 A. I don't remember when it was. 5 Q. Did Phil ever admit to you that he bought her 6 gifts? 7 A. No. 8 Q. He never mentioned he bought her a tanning 9 package? 10 A. No. 11 Q. He never mentioned he bought her an Ed Hardy 12 hat? 13 A. No. 14 Q. Ever? 15 A. Never. 16 Q. He never mentioned he bought her earrings? 17 A. No. 18 Q. A shirt? 19 A. No. 20 Q. A hoagie at Subway? 21 A. No. 22 Q. Nothing? 23 A. Nothing. 24 Q. Did he ever tell you who befriended who 25 first, how he came into contact with Brie?</p>
<p style="text-align: right;">Page 83</p> <p>1 if she had any additional information regarding the 2 relationship with Godlewski and..." blacked out, that's 3 Brie's name there. 4 A. Uh-huh. 5 Q. "Dori stated she knew what was going on and 6 did not believe any of the accusations against 7 Godlewski." Is that what you told them? 8 A. Yeah. 9 Q. And you stated you were engaged to Godlewski 10 and believes he had no contact with Brie; is that 11 correct? 12 A. Yeah. 13 Q. Let me ask you this. Getting to the 14 relationship Phil had with Brie, do you remember that 15 around the time of Joe Strok's death, they were talking 16 or texting, you found out about it and you said, cut it 17 out, and he did for a while and then he restarted 18 communicating with Brie again. Do you remember that? 19 A. So you're saying around the time Joe died, 20 they were talking -- 21 Q. Late 2008; November, December, right? 22 A. Okay. 23 Q. Is that the time frame you thought Brie and 24 Phil were talking? 25 A. I don't know. I don't remember when it was</p>	<p style="text-align: right;">Page 85</p> <p>1 A. I believe it was, she was in the store crying 2 and he -- 3 Q. She was in the Subway or the gas station? 4 A. In the Subway, yeah, crying with her friend 5 and he went over to see what was going on. And that's 6 how it started. 7 Q. Did he ever tell you that he thought she was 8 suicidal? 9 A. Yes. 10 Q. Okay. When did he tell you that? 11 A. I don't know. I guess maybe when I started, 12 like, asking why he was talking to her or whatever. I 13 don't really remember exactly when. 14 Q. And he told you she was suicidal over the 15 death of her boyfriend? 16 A. Yeah. 17 Q. Okay. And that concerned him? 18 A. Yeah. 19 Q. And he had never known this girl beforehand? 20 A. Yeah. 21 Q. Did you tell him to report the situation to 22 her counselor at Riverside High School? 23 A. Yes. 24 Q. And what did he say? 25 A. I don't remember. I don't know.</p>

22 (Pages 82 - 85)

<p style="text-align: right;">Page 86</p> <p>1 Q. Why did your engagement last so long, 2007 to 2 2012?</p> <p>3 A. We were remodeling our house, all that 4 happened.</p> <p>5 Q. When you say "all that," you mean the charges 6 involving Brie?</p> <p>7 A. Yeah.</p> <p>8 Q. Okay.</p> <p>9 A. Just saving money, planning. No real reason, 10 I guess.</p> <p>11 Q. Which hotel were you working at when Brie 12 approached you?</p> <p>13 A. The Hampton Inn.</p> <p>14 Q. You cleaned there?</p> <p>15 A. I cleaned the rooms, yeah.</p> <p>16 Q. What years did you work there?</p> <p>17 A. Oh, boy. 2000 -- probably 2005. And then 18 we -- I don't know when I stopped working there. I 19 can't remember how long I was there. A few years, I 20 worked there.</p> <p>21 Q. So is it your testimony that the news 22 articles from 2010 and 2011 and the publicity about him 23 pleading guilty to corrupting the morals of a minor did 24 not have any effect on Phil's reputation?</p> <p>25 A. I'm sure it had some, but I don't think it</p>	<p style="text-align: right;">Page 88</p> <p>1 Q. -- you had finally come to realize that Phil 2 did have a sexual relationship with her?</p> <p>3 A. I don't know if I realized that he did or if 4 I just realized that -- what he put me through, all the 5 lies that I believed. I believed that there was a 6 chance that, you know, he lied to me then, then. And 7 that's, kind of, what I meant by that.</p> <p>8 Q. Did you come to know how old Miranda Polidori 9 is?</p> <p>10 A. I do know, yeah.</p> <p>11 Q. And she's significantly younger than Phil as 12 well?</p> <p>13 A. Yeah, I believe she's the same age as Brie.</p> <p>14 Yeah.</p> <p>15 Q. So she's either nine, ten years younger than 16 Phil too?</p> <p>17 A. Yeah.</p> <p>18 Q. Have you come to realize that Phil is 19 attracted to younger women?</p> <p>20 A. Yeah. I mean, I guess he is, yeah.</p> <p>21 Q. Okay. What's your interactions with Phil now 22 that you're divorced?</p> <p>23 A. Just, pretty much, the kids.</p> <p>24 Q. Strictly talk about the kids?</p> <p>25 A. For the most part, yeah.</p>
<p style="text-align: right;">Page 87</p> <p>1 impacted -- it didn't -- it didn't really ruin his 2 career. You know, it didn't -- people still used him 3 for real estate and people who were his friends before 4 that were still his friends. No, I think -- I think 5 people believed him.</p> <p>6 Q. You know that Miranda Polidori got a PFA 7 against Phil, correct?</p> <p>8 A. I did not know that.</p> <p>9 Q. It's in here. The situation involving 10 Miranda, did that affect Phil's reputation at all?</p> <p>11 A. No, I don't think too many people knew about 12 it.</p> <p>13 Q. Did you go to Phil's wedding --</p> <p>14 A. No.</p> <p>15 Q. -- to Keri?</p> <p>16 A. No.</p> <p>17 Q. But your boys did?</p> <p>18 A. Yes.</p> <p>19 Q. Who was watching the boys down there in the 20 Dominican Republic?</p> <p>21 A. Phil, Keri and Phil's mother and Tommy.</p> <p>22 Q. And Tommy. When you apologized to Brie for 23 not believing her when you had this long phone 24 conversation with her --</p> <p>25 A. Uh-huh.</p>	<p style="text-align: right;">Page 89</p> <p>1 Q. Does he seem happy?</p> <p>2 A. He does.</p> <p>3 Q. Phil?</p> <p>4 A. Yeah, he does.</p> <p>5 Q. Happy with his new life?</p> <p>6 A. Yes.</p> <p>7 Q. His new wife?</p> <p>8 A. Yeah.</p> <p>9 Q. His new career?</p> <p>10 A. Yeah.</p> <p>11 Q. Did he tell you, I'm never going back to real 12 estate?</p> <p>13 A. Yeah, he has said that.</p> <p>14 Q. Yeah?</p> <p>15 A. Yeah.</p> <p>16 Q. He's very happy doing what he's doing?</p> <p>17 A. Yeah.</p> <p>18 Q. When Phil was married to you, was he on 19 medications for depression or anxiety?</p> <p>20 A. Yeah.</p> <p>21 Q. Okay. And that was before the article?</p> <p>22 A. Yeah.</p> <p>23 Q. I just want to look over your testimony from 24 the custody hearing you had with Phil.</p> <p>25 A. Okay.</p>

<p style="text-align: right;">Page 90</p> <p>1 Q. It starts on ST486. On Page 489, it shows 2 four pages from the transcript on each page. 3 A. Okay. 4 Q. Page 11, Mr. Williams, your attorney here 5 today, asked the question, the question is, "What are 6 your concerns with regard to him using the children 7 through his social media or various online enterprises?" 8 And what was your answer at that time? 9 A. "I don't know how to answer it because when I 10 try to answer..." 11 Q. Then the next question was, "That is okay. 12 Answer the question the best you can. What are your 13 concerns? What are you worried about?" And what was 14 your answer at this hearing? 15 A. "That there are people who support him and 16 are dangerous and he's putting them in danger." 17 Q. Okay. And that's truthful and honest 18 testimony from you at that time, correct? 19 A. Yeah. 20 Q. Then if we go to Page 12, the bottom question 21 on Line 23, the question was, "What are your concerns 22 with regard to Q&amp;I?" I think it's a mistype. It means 23 QAnon. 24 A. Right. 25 Q. "The conspiracy theories that he's involved</p>	<p style="text-align: right;">Page 92</p> <p>1 asked you the question, "Have you ever observed Mr. 2 Godlewski to have conversations with your children that 3 were inappropriate or otherwise not age-appropriate for 4 children?" And your answer was? 5 A. "Yes." 6 Q. If we go to Page 25 in the transcript, it's 7 ST492, at the bottom of Line 24, question, "Is it fair 8 to say one of your concerns about the blogging is that 9 there are a bunch of people that are involved with these 10 bloggings that you call crazy?" Your answer was? 11 A. "Yes." 12 Q. That's true and accurate? 13 A. Yes. 14 Q. Next question, "In response to that, you said 15 that there were theories that you feel are crazy that go 16 along with those bloggings such as the world is flat and 17 that kind of stuff?" Your answer? 18 A. "Yes." 19 Q. Truthful and accurate? 20 A. Yeah. 21 Q. And you said, "Another reason is that the 22 children were involved in these blogs?" Your answer? 23 A. Yes. "It is a big reason, yes." 24 Q. Looking at Page 36 of the transcript on Line 25 11 -- in your custody battle with Phil, on Line 11 the</p>
<p style="text-align: right;">Page 91</p> <p>1 in." And what's your answer? 2 A. "It's a cult and people that do a lot of 3 crazy things and -- I mean, people who drink blood and 4 get high and all of this stuff. And he reports this and 5 he believes this and then he puts my children in these 6 videos and on social media for people to see them and it 7 is scary, very scary." 8 Q. Then on Page 14, Mr. Williams asked you a 9 question on Line 1, "So you said that they have a lot of 10 bizarre beliefs. I think you said that they believe 11 that people drink babies' blood. Can you detail some of 12 the beliefs that you believe are concerning with regard 13 to the conspiracy theory?" What was your answer? 14 A. "There's a lot of things. There's the blood. 15 There's the neo..." 16 Q. Nazis? 17 A. Yeah. "They believe in white supremacy, that 18 Trump is still our president, Biden is dead and is an 19 actor. In the White House, he believes that he has 20 alien blood. It's crazy." 21 Q. And then the next question was, "He's told 22 you these things? You've heard them come from his mouth 23 personally?" And what was your answer? 24 A. "Yes." 25 Q. And then on Page 185, Line 5, Mr. Williams</p>	<p style="text-align: right;">Page 93</p> <p>1 question is, "Do you feel as though someone who holds 2 views of white supremacy would be poor or be 3 inappropriate to parent your children?" And your 4 answer, after some objections, on Line 21 was, "I 5 believe that the belief could be part of that, yes." 6 Witness -- down below on Line 25, "I believe their 7 belief could be bad parenting, yes." 8 Next page, "Do you want your kids 9 exposed to white supremacy?" Answer: "Absolutely not," 10 correct? 11 A. Correct. 12 Q. And that's your view; true and honest 13 testimony; is that correct? 14 A. Yes. 15 Q. You're then asked the question, "Do you want 16 your children exposed to cult theories about drinking 17 babies' blood?" And your answer was? 18 A. "Absolutely not, no." Oh, "No." Yeah, 19 sorry, I was on the wrong one. 20 Q. If you turn to ST497, Mr. Williams was 21 cross-examining Phil on Page 42, Line 17. "Do you 22 believe that there are people that exist in America that 23 are keeping children in captivity and are extracting 24 drugs from their body through some source and using them 25 recreationally?" And Phil's answer was, "Yes. But I</p>

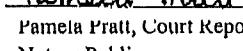
24 (Pages 90 - 93)

Page 94	Page 96
1 have to correct a portion of what you said because 2 they're not extracting drugs from the child's body. 3 There's a widely-known natural chemical that is produced 4 within the child's -- in only a child six or under -- 5 body similar to adrenaline." Do you remember that 6 testimony from Phil?	1 contention -- Question: "Is it your contention that you 2 pled guilty to a crime your wife committed to protect 3 her?" His answer was, "Yes." Did he direct you to 4 write out the check that bounced?
7 A. Uh-huh.	5 A. Yes.
8 Q. Yes?	6 Q. Okay. Did he tell you there was money in the 7 account to cover the check?
9 A. Yes.	8 A. Yes.
10 Q. And that's his belief, that there is a cult 11 out there torturing and cannibalizing children to 12 extract adrenochrome from their scared bodies; is that 13 correct?	9 Q. The next question on Line 25 on Page 84, "Why 10 did you have to get a firearm?" Answer -- this is from 11 Phil now. Answer on Line 1, "My wife and I discussed 12 getting a firearm for the months leading up to the 13 purchase. We actually -- one night, we were about to go 14 to Roll Call to purchase one. So we discussed that at 15 length and we thought that the political environment as 16 well as the circumstances happening in the world 17 required us to be safe." Did you discuss for months 18 with Phil purchasing a gun and going to Roll Call?
14 A. Yeah.	19 MR. BOWERS: Objection. Spousal 20 privilege.
15 Q. And that's what he propagates on the social 16 media; is that correct?	21 MR. HINTON: Well, it's already out. 22 This is his testimony. He said it to third parties. Do 23 you want to withdraw the objection? He said it to a 24 judge.
17 A. Yeah.	25 MR. BOWERS: Yeah. Sure. Go ahead.
18 Q. And he wants all his believers to believe?	
19 A. Yeah.	
20 Q. That high-level Democrats and actors -- the 21 elites, he calls them, are torturing, sacrificing and 22 cannibalizing children to get adrenochrome, correct?	
23 A. Yes.	
24 Q. And that troubles you; does it not?	
25 A. Yeah.	
Page 95	Page 97
1 Q. Very much so, correct?	1 MR. HINTON: Okay. Thank you.
2 A. Yes.	2 BY MR. HINTON:
3 Q. Now, looking at Page 55, Phil is testifying 4 on cross-examination for Mr. Williams. And it's at the 5 bottom of Page 55 on line 24, Phil says, "The whole 6 reason that the gun was purchased to begin with was for 7 protection of my family. There was a lot of civil 8 unrest going on around the country and I just -- I just 9 wanted to be safe. If somebody were to have to come to 10 our house, we did not have any protection." Do you 11 recall Phil ever talking to you about buying a rifle to 12 protect your family because of civil unrest in the 13 community?	3 Q. Did that happen? 4 A. I don't know. Him bringing up us buying a 5 gun and me saying no, I guess that is a discussion. But 6 I don't remember discussing going to Roll Call to buy 7 one, no.
14 A. Yes.	8 Q. And to your knowledge, you never bought one?
15 Q. Did he actually buy a rifle?	9 A. No.
16 A. No.	10 Q. And he never bought one?
17 Q. So he's lying here in his testimony?	11 A. No.
18 A. I don't know. Wait.	12 Q. He says below on Page 85, Line 12, Question: 13 "Were there threats that were made against you or your 14 family?" Answer: "Yes. I've had threats made against 15 me for a number of years from real estate as well as 16 what I do now for a living." Are you aware of any 17 threats?
19 Q. He says he purchased it.	18 A. Not doing real estate, no.
20 A. Then, yeah. I mean, unless he purchased it 21 after he's speaking of -- after I left. But he didn't 22 purchase one when we lived together, no.	19 Q. How about what he does now in terms of social 20 media?
23 Q. Let's go to Page 84 in the transcript.	21 A. Yes.
24 A. Okay.	22 MR. HINTON: All right. Those are all 23 the questions I have.
25 Q. So on Line 19 he says, "It is your	24 MR. BOWERS: I have a very few and then 25 we'll get you done if we can go straight through.

<p style="text-align: right;">Page 98</p> <p>1        THE WITNESS: Okay.</p> <p>2                * * *</p> <p>3        EXAMINATION</p> <p>4                * * *</p> <p>5 BY MR. BOWERS:</p> <p>6 Q.       Dori, would it be fair to say that you</p> <p>7 disagree with Phil about all the QAnon stuff?</p> <p>8 A.       Yeah.</p> <p>9 Q.       And could you be induced to agree with it in</p> <p>10 exchange for a house? In other words, could he get you</p> <p>11 to agree to that stuff by giving you a house?</p> <p>12 A.       No.</p> <p>13 Q.       Nah. Could he get you to agree to that by</p> <p>14 paying you 12,500 bucks a month in child support?</p> <p>15 A.       No.</p> <p>16 Q.       In fact, could he pay you any amount of money</p> <p>17 to get you to agree with that?</p> <p>18 A.       No.</p> <p>19 Q.       In fact, could any amount of money induce</p> <p>20 you -- get you to lie under oath?</p> <p>21 A.       No.</p> <p>22 Q.       Okay. During your divorce -- Mr. Hinton</p> <p>23 asked you some questions about that -- were you</p> <p>24 represented by Mr. Williams throughout your entire</p> <p>25 divorce?</p>	<p style="text-align: right;">Page 100</p> <p>1 A.       Yeah.</p> <p>2 Q.       That going pretty well?</p> <p>3 A.       Yeah.</p> <p>4 Q.       Yeah. Okay. So I want to come to just one</p> <p>5 thing,</p> <p>6 A.       Okay.</p> <p>7 Q.       Very early in your testimony, you said you</p> <p>8 had a conversation with Brie in which Brie admitted to</p> <p>9 you that she did not have a sexual relationship with</p> <p>10 Phil.</p> <p>11 A.       Correct.</p> <p>12 Q.       When was that?</p> <p>13 A.       That was before he was arrested; I don't know</p> <p>14 exactly when. I know it was before he was arrested;</p> <p>15 shortly after I had, kind of, found out that they were</p> <p>16 talking. I don't remember the exact time.</p> <p>17 Q.       Okay. That's fine. Did this conversation</p> <p>18 happen in person or on the phone?</p> <p>19 A.       It was on Facebook Messenger.</p> <p>20 Q.       Okay. So it was by Messenger?</p> <p>21 A.       Yeah.</p> <p>22 Q.       And what is it -- how did this conversation</p> <p>23 come to happen?</p> <p>24 A.       I don't remember. I don't know if I messaged</p> <p>25 her or she messaged me. I don't remember exactly how it</p>
<p style="text-align: right;">Page 99</p> <p>1 A.       I did have Brian Cali for a little while, but</p> <p>2 he pretty much just filed the paperwork and then</p> <p>3 Attorney Williams, yeah.</p> <p>4 Q.       Okay. So you had lawyers throughout the</p> <p>5 entire process, correct?</p> <p>6 A.       Correct. Yeah.</p> <p>7 Q.       And your divorce took a little over two years</p> <p>8 to settle, correct?</p> <p>9 A.       Yes.</p> <p>10 Q.       And during that time -- and I don't want you</p> <p>11 to tell me anything that you said to Mr. Williams or Mr.</p> <p>12 Williams said to you, but did you consult with Mr.</p> <p>13 Williams about various proposals to settle your divorce?</p> <p>14 A.       Yes.</p> <p>15 Q.       Okay. Did you consider any proposals to</p> <p>16 settle your divorce?</p> <p>17 A.       Not really, no. We, kind of, just came up</p> <p>18 with the house and that was that.</p> <p>19 Q.       Okay. And after consultation with your</p> <p>20 counsel, did you feel that that was a fair deal to</p> <p>21 settle your divorce?</p> <p>22 A.       Yes.</p> <p>23 Q.       Okay. And I believe despite all of your</p> <p>24 misgivings about Phil's QAnon view, you eventually</p> <p>25 agreed to a 60-40 split for custody of your boys, right?</p>	<p style="text-align: right;">Page 101</p> <p>1 started.</p> <p>2 Q.       Okay. But you and Brie found your way into</p> <p>3 contact with one another, correct?</p> <p>4 A.       Yeah.</p> <p>5 Q.       Okay. No doubt you were wondering what on</p> <p>6 earth was going on.</p> <p>7 A.       Yeah.</p> <p>8 Q.       What did Brie tell you?</p> <p>9 A.       That he was nothing but a friend, like a big</p> <p>10 brother. He was just helping her through a hard time</p> <p>11 and there was nothing to worry about.</p> <p>12 Q.       Did you have any reason to doubt that?</p> <p>13 A.       No.</p> <p>14 Q.       Do you have any reason to think that's untrue</p> <p>15 today?</p> <p>16 A.       I mean, I guess not. I don't know. I mean,</p> <p>17 I know the lies that he said to me, so -- now and in the</p> <p>18 past. So I don't know what to believe. But no, I have</p> <p>19 no reason to believe that it wasn't true.</p> <p>20 Q.       Okay. And then after that, you were in court</p> <p>21 when Brie said, I plead the Fifth, I'm not going to</p> <p>22 testify, right?</p> <p>23 A.       Yes.</p> <p>24 Q.       One moment.</p> <p>25 (Pause)</p>

26 (Pages 98 - 101)

<p style="text-align: right;">Page 102</p> <p>1           MR. BOWERS: Thank you. We have no 2 further questions.</p> <p>3           MR. HINTON: Just a couple follow-ups. 4 Sorry, Jonathan.</p> <p>5           MR. WILLIAMS: You're killing me. 6           * * * 7           EXAMINATION 8           * * *</p> <p>9 BY MR. HINTON:</p> <p>10 Q.       Looking at ST620, if you could open up to 11 that, please, Dori.</p> <p>12 A.       Yes.</p> <p>13 Q.       That's the Affidavit of Probable Cause from 14 the police, the detectives. In the middle of the page 15 on ST620, it says, "Between June 9th and June 11th, 16 2010, investigators attempted to contact Phil Godlewski 17 at his place of employment. Several messages were left 18 for him asking him to contact investigators as soon as 19 possible. On June 11th, 2010, Godlewski called Mancuso 20 and informed her that he was represented by an attorney 21 from Harrisburg and Godlewski stated he was advised not 22 to talk to me. I contacted the Harrisburg attorney and 23 asked him to contact me after he has had time to talk 24 with Godlewski. As of date, I have not heard back from 25 the Harrisburg attorney." So, Dori, to put this in</p>	<p style="text-align: right;">Page 104</p> <p>1 talk. You know, you get an attorney and you don't say 2 anything regardless of the situation. So no, I didn't 3 tell him to just sit down and talk to them.</p> <p>4 Q.       Okay. So this conversation you had with Brie 5 where she told you Phil's like a friend, a big brother 6 to me, how close in time was it to the time that the 7 detectives are trying to talk to Phil in June of 2010? 8 Was it around that same time period?</p> <p>9 A.       I don't remember, I don't know.</p> <p>10 Q.       Could it have been the year before, 2009?</p> <p>11 A.       I mean, I don't know. Maybe. I don't know. 12 I really don't remember when that conversation was.</p> <p>13 Q.       But Phil never told you the principal called 14 him in and asked him about his relationship with Brie?</p> <p>15 A.       No, I don't remember that. No.</p> <p>16 Q.       Phil never told you the principal told Phil 17 on January 8th of 2009, stop being in contact with Brie?</p> <p>18 A.       Huh-uh.</p> <p>19 MR. WILLIAMS: Is that a no?</p> <p>20 THE WITNESS: No. Sorry.</p> <p>21 MR. WILLIAMS: That's okay.</p> <p>22 BY MR. HINTON:</p> <p>23 Q.       The \$12,500 per month, does that have an end 24 date on it when that ends? Is it for ten years? Is it 25 five years? How long is it for?</p>
<p style="text-align: right;">Page 103</p> <p>1 context, Phil was charged on July 9th, the detectives 2 are talking to Phil on June 9th and 11th -- or 11th --</p> <p>3 A.       Yeah.</p> <p>4 Q.       -- Godlewski calls Mancuso. Did Phil ever 5 tell you he was contacted by the detectives in mid June 6 of 2010?</p> <p>7 A.       He did, yes.</p> <p>8 Q.       What did he tell you?</p> <p>9 A.       Just that there was some -- there was 10 something going on with the whole thing with Brie and 11 that he had gotten an attorney. And that if they came 12 to me, that I don't have to say anything.</p> <p>13 Q.       And did Phil ever cooperate with the 14 detectives and sit down and give them a statement and --</p> <p>15 A.       I don't believe so.</p> <p>16 Q.       -- tell them his side of the story?</p> <p>17 A.       I don't believe so.</p> <p>18 Q.       He at least never told you that?</p> <p>19 A.       No.</p> <p>20 Q.       Did you ever suggest to Phil back in 2010 in 21 these months, June, sit down and just tell them the 22 truth and let them know this girl's lying, I never had 23 sex with her?</p> <p>24 A.       Honestly, no, I didn't because I watched 25 stupid shows and stuff and I feel like you shouldn't</p>	<p style="text-align: right;">Page 105</p> <p>1 A.       Until they're 18 -- until my kids are 18. 2 Q.       And then once your youngest son -- [REDACTED] ? 3 A.       Yes.</p> <p>4 Q.       Turns 18, it's over?</p> <p>5 A.       Yes.</p> <p>6 Q.       And is there any other financial compensation 7 paid to you other than 12,500?</p> <p>8 A.       No.</p> <p>9 MR. HINTON: Those are all the questions 10 I have.</p> <p>11 (Witness excused.)</p> <p>12 (The deposition was concluded at 12:04 p.m.)</p> <p>13 * * *</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

C E R T I F I C A T E		Page 106	Page 108
1	I, Pamela Pratt, Court Reporter and	1 Godlewski, Philip v. Kelly, Chris Et Al	
2	Notary Public in and for the Commonwealth of	2 Dorothea "Dori" Godlewski (#5997513)	
3	Pennsylvania, certify that the foregoing is a true and	3 B R R A T A S H E E T	
4	accurate transcript of the deposition of said witness	4 PAGE ____ LINE ____ CHANGE _____	
5	taken by me on the date and place hereinbefore set	5 _____	
6	forth.	6 REASON _____	
7		7 PAGE ____ LINE ____ CHANGE _____	
8		8 _____	
9		9 REASON _____	
10		10 PAGE ____ LINE ____ CHANGE _____	
11	I further certify that I am neither	11 _____	
12	attorney nor counsel for, nor related to or employed by,	12 REASON _____	
13	any of the parties to the action in which this	13 PAGE ____ LINE ____ CHANGE _____	
14	deposition was taken, and further, that I am not a	14 _____	
15	relative or employee of any attorney or counsel employed	15 REASON _____	
16	in this action, nor am I financially interested in this	16 PAGE ____ LINE ____ CHANGE _____	
17	case.	17 _____	
18		18 REASON _____	
19		19 PAGE ____ LINE ____ CHANGE _____	
20		20 _____	
21		21 REASON _____	
22		22 _____	
23	 Pamela Pratt, Court Reporter	23 _____	
24	Notary Public	24 Dorothea "Dori" Godlewski	Date
25		25	
Page 107		Page 109	
1	Dorothea Godlewski	1 Godlewski, Philip v. Kelly, Chris Et Al	
2	115 Huckleberry Lane, Duryea, PA 18642	2 Dorothea "Dori" Godlewski (#5997513)	
3	August 8, 2023	3 ACKNOWLEDGEMENT OF DEONENT	
4	RE: Godlewski, Philip v. Kelly, Chris Et Al	4 I, Dorothea "Dori" Godlewski, do hereby declare that I	
5	7/20/2023, Dorothea "Dori" Godlewski (#5997513)	5 have read the foregoing transcript, I have made any	
6	The above-referenced transcript is available for	6 corrections, additions, or changes I deemed necessary as	
7	review.	7 noted above to be appended hereto, and that the same is	
8	Within the applicable timeframe, the witness should	8 a true, correct and complete transcript of the testimony	
9	read the testimony to verify its accuracy. If there are	9 given by me.	
10	any changes, the witness should note those with the	10	
11	reason, on the attached Errata Sheet.	11 _____	
12	The witness should sign the Acknowledgment of	12 Dorothea "Dori" Godlewski	Date
13	Deponent and Errata and return to the deposing attorney.	13 *If notary is required	
14	Copies should be sent to all counsel, and to Veritext at	14 SUBSCRIBED AND SWORN TO BEFORE ME THIS	
15	cs-midatlantic@veritext.com	15 _____ DAY OF _____, 20____	
16		16	
17	Return completed errata within 30 days from	17	
18	receipt of testimony.	18 _____	
19	If the witness fails to do so within the time	19 NOTARY PUBLIC	
20	allotted, the transcript may be used as if signed.	20	
21		21	
22	Yours,	22	
23	Veritext Legal Solutions	23	
24		24	
25		25	

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